

Facility Response Plan

Oil Pollution Act of 1990 Manual



December, 2009

OIL POLLUTION ACT OF 1990
MANUAL

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OIL POLLUTION ACT OF 1990
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1.1 EMERGENCY RESPONSE ACTION PLAN

A - Qualified Individual Information (Section 1.3.6)

B - Emergency Notification Phone List (Section 1.3.1)

C - Spill Response Notification Form (Section 1.3.1)

D - Response Equipment List and Location (Section 1.3.2)

E - Response Equipment Testing and Deployment (Section 1.3.3)

F - Facility Response Team (Section 1.3.4)

G - Evacuation Plan (Section 1.3.5)

H - Immediate Actions (Section 1.7.1)

I - Facility Diagrams (Section 1.9)

A - Qualified Individual Information

1.2 FACILITY INFORMATION

Facility Name:	The Lubrizol Corporation - Painesville Plant
Location:	155 Freedom Road Painesville Township Lake County Ohio 44077 (440) 357-7064 One-half mile northwest of Painesville City
Latitude:	N41° 43' 13"
Longitude:	W81° 16' 25"
Wellhead Protection Area:	Not Applicable
Owner:	The Lubrizol Corporation 29400 Lakeland Boulevard Wickliffe Lake County Ohio 44092 (440) 943-1200
Operator:	The Lubrizol Corporation - Painesville Plant (Same as Facility Name and Location)
Qualified Individual (Emergency Response Coordinator):	See Section 1.3.4 Response Personnel for specific explanations and lists of emergency coordinators.
Designated person accountable for oil spill response at the facility is:	Patrick R. Shannon Work Phone: (440) 347-3953 Home Address: 6801 South Ridge Road Unionville, Ohio 44088 Home Phone: (440) 228-1859 Emergency Phone (Cell): (440) 343-7493 Training (as of 2009): 10 years as Fire Chief, 20 years as a member of the Emergency Response Organization. 3.5 years as a Shift Fire Chief. 20 years as a Member of a Municipal Fire Department (3 years at the rank of Lieutenant). State Certified Fire and EMT Instructor. Ohio Fire Academy Hazardous Materials Technician Instructor.
Date of Oil Storage Startup:	1956 Initial purchase of property

1.3.6 Description of Qualified Individual's Duties

The qualified individual in the event of an emergency will perform the following duties:

- Immediately respond to an activated internal plant alarm. This in turn directs the emergency responders to the exact location.
- Identify the character, exact source, amount, and extent of the release by information gathered from personal knowledge, engineers and operators, and material safety data sheets (MSDS).
- Notify if necessary all Federal, State and local authorities of the needed information.
- Assess the interaction of the spilled substance with water and/or other substances and notify the response personnel of assessment results. The determination will be made by information gathered from personal knowledge, engineers and operators, and material safety data sheets (MSDS).
- Assess the possible hazards to human health and the environment due to the release.
- Contain and remove the substance immediately.
- Acts as incident commander to coordinate rescue and response actions at the scene.
- Authorize the release of funding to initiate cleanup.
- Stay at scene to direct cleanup activities until completed or is properly relieved of responsibilities.

The following pages have been copied from Lubrizol-Painesville's RCRA Contingency Plan. These support the above information. Although the RCRA Contingency Plan has been written specifically to address a release of hazardous waste, the same procedures are followed for the release of any oil or chemical.

B - Emergency Notification Phone List

EMERGENCY OUTSIDE CONTACTS

Lubrizol

Painesville Plant

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EMERGENCY OUTSIDE CONTACTS

Lubrizol

Painesville Plant



L.E.P.C.'s LOCAL EMERGENCY PLANNING COMMITTEE

LAKE COUNTY L.E.P.C. Phone: (440) 918-5499

CUYAHOGA COUNTY L.E.P.C. Phone: (216) 771-1363

ASHTABULA COUNTY L.E.P.C. Phone : (440) 576-9148

GEAUGA COUNTY L.E.P.C. Phone: (440) 285-9200
After Hours (440) 286-1234

REGULATORY AGENCIES

FEDERAL AGENCIES

NATIONAL RESPONSE CENTER (NRC) Phone: 1-800-424-8802
US COAST GUARD OPERATIONS CENTER Phone: 1-800-321-4400

AAR (Association of American Railroads)	Phone: (202) 639-2222
US EPA	Phone: 1-800-621-8431
OSHA - REGION 5 OFFICE - CHICAGO	Phone: (312) 353-2220
CHEMTREC (Emergency Hot Line)	Phone: 1-800-424-9300
CHEMTREC (Non-Emergency)	Phone: 1-800-262-8200
CENTER FOR DISEASE CONTROL	Phone: (404) 639-3535
FEDERAL EMERGENCY MGMT. AGENCY	Phone: 1-800-242-9300
AMERICAN CHEMISTRY COUNCIL	Phone: (703) 741-6000
U.S. DEPT. OF TRANSPORTATION	Phone: (202) 366-0656

STATE AGENCIES

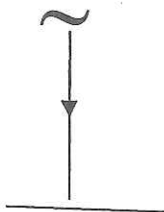
OHIO ENVIRONMENTAL PROTECTION AGENCY (EPA) Phone: 1-800-282-9378
Alternate Phone: 1-614-224-0946

STATE EMERGENCY RESPONSE COMMISSION (SERC)	Phone: 1-800-282-9378
PUBLIC UTILITY COMMISSION OF OHIO	Phone: 1-800-686-8277
OHIO DEPT. OF TRANSPORTATION	Phone: (440) 354-2191

EMERGENCY OUTSIDE CONTACTS

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Painesville Plant



LOCAL AGENCIES

LAKE COUNTY GENERAL HEALTH DIST. Phone: (440) 350-2543

OSHA (CLEVELAND OFFICE)	Phone: (216) 522-3818
LAKE COUNTY EMERGENCY MANAGEMENT AGENCY	Phone: (440) 350-5368
COAST GUARD (FAIRPORT OFFICE)	Phone: (440) 352-3111
COAST GUARD (CLEVELAND OFFICE)	Phone: (216) 902-6000
COAST GUARD (CLEVELAND MARINE SAFETY OFFICE)	Phone: (216)-937-0111
LAKE COUNTY ENGINEER'S OFFICE	Phone: (440) 350-2770
MENTOR MARSH BOARD OF MANAGEMENT (only contact if spill has potential to effect Mentor Marsh)	
Tom Rapini, Chair	Phone: 440-257-2673
Dr. James Bissell (Cleveland Museum of Natural History)	Phone: 216-231-4600 (W) x3219 Phone: 440-466-8255 (H)

POLICE AND LAW ENFORCEMENT

LAKE COUNTY SHERIFF'S DEPT. Phone: (440) 953-5391
or (440) 350-5620
LAKE COUNTY CENTRAL DISPATCH Phone: (440) 354-4317

PAINESVILLE CITY POLICE	Phone: (440) 639-4863
FAIRPORT HARBOR POLICE	Phone: (440) 354-4317
GRAND RIVER POLICE	Phone: (440) 352-1287
MENTOR POLICE	Phone: (440) 255-1234

OHIO STATE HIGHWAY PATROL (CHARDON POST)	Phone: (440) 354-3233
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F.B.I.	Phone: (440) 522-1400
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EMERGENCY OUTSIDE CONTACTS

Lubrizol

Painesville Plant

BOMB SQUAD

NOTIFY LAKE COUNTY SHERIFF'S DEPT. Phone: (440) 953-5391 or
(440) 350-5620

ENVIRONMENTAL SERVICES

INLAND WATERS
CLEAN HARBORS
CHEMTRON

Phone: 1-800-869-3949
Phone: (216) 881-5008
Phone: (440) 937-5950 (24 hrs.)

UTILITY SERVICES

PAINESVILLE CITY WATER
DISTRIBUTION, SERVICE & REPAIR

Phone: (440) 392-2975
Phone: (440) 392-9565 (after hours)

PAINESVILLE CITY WATER
POLLUTION CONTROL

Phone: (440) 392-6316

EAST OHIO GAS COMPANY

Phone: (800) 521-4400 (emergency - bypasses
the non-priority queue)
Phone: (216) 736-6650 (secondary)
Phone: (216) 736-6914 (non emer. leak detection)
Phone: (440) 717-5460

THE ILLUMINATING COMPANY

EPCO (Carbon Dioxide supplier)

Phone: (800) 259-8095
Request EMERGENCY delivery of Carbon Dioxide.
EPCO dispatcher has instructions to immediately
contact their supervisor and Tom Gannon (work 440-
930-4779 or cell 440-670-5574) and advise of
emergency at Lubrizol.
Dispatcher can also call Ric Wiesemann 318-537-
3371 or Darrell Craft 318-537-3370.
Truck deliveries will commence within 10 hours @
up to 3 per day.

EMERGENCY OUTSIDE CONTACTS

Lubrizol

Painesville Plant

FIRE DEPARTMENTS

PAINESVILLE TOWNSHIP FIRE DEPT. Phone: (440) 354-3513

CONCORD FIRE DEPARTMENT	Phone: (440) 354-7504
FAIRPORT FIRE DEPARTMENT	Phone: (440) 352-3620
GRAND RIVER FIRE DEPARTMENT	Phone: (440) 352-9133
MENTOR FIRE DEPARTMENT	Phone: (440) 255-1212
PAINESVILLE CITY FIRE DEPARTMENT	Phone: (440) 354-3579

AMBULANCE SERVICE

TRI-COUNTY AMBULANCE	Phone: (440) 951-4600
TRASK AMBULANCE	Phone: (440) 286-9374
COMMUNITY CARE AMBULANCE	Phone: 1-800-292-5707

LIFE FLIGHT



METRO LIFE FLIGHT
NON-EMERGENCY (800) 255-2229

**LIFE FLIGHT
OPERATIONS
(800) 233-5433**

Incident Commander shall request:

- Life Flight for a scene run giving Lubrizol's name and location.
- Life Flight to "Stand-by" for a run giving Lubrizol's name and location.
- Life Flight to meet Rescue Squad at TriPoint Medical Center E.R. giving Lubrizol's name and location.

EMERGENCY OUTSIDE CONTACTS

Lubrizol

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HOSPITALS

TRIPOINT HOSPITAL	E.R. Office Phone: (440) 354-1685
	Squad Phone: (440) 354-5150
LAKE WEST HOSPITAL	E.R. Phone: (440) 946-6129
RICHMOND HEIGHTS HOSPITAL	E.R. Phone: (440) 585-6433
MERIDIA EUCLID HOSPITAL	E.R. Phone: (216) 296-8650
MERIDIA HILLCREST HOSPITAL	E.R. Phone: (440) 449-4600
GEAUGA REGIONAL HOSPITAL	Phone: (440) 946-4200
UNIVERSITY HOSPITAL	E.R. Phone: (216) 844-3835

TRAUMA & BURN

METRO HEALTH MEDICAL CENTER BURN UNIT	Phone: (216) 778-5627
HILLCREST HOSPITAL	Phone: (440) 449-4600

POISON CONTROL

Phone: (216) 231-4455

FATALITIES

LAKE COUNTY SHERIFF'S DEPT.	Phone: (440) 953-5391
or	(440) 350-5620
COUNTY CORONER	Phone: (440) 350-2789
OSHA (CLEVELAND OFFICE)	Phone: (216) 522-3818

EMERGENCY OUTSIDE CONTACTS

Lubrizol

Painesville Plant

MEDIA

TV

CHANNEL 3	Phone: (216) 344-3300 Fax: (216) 344-3314
CHANNEL 5	Phone: (216) 431-3750 Fax: (216) 431-3666
CHANNEL 8	Phone: (216) 432-4240 Fax: (216) 391-4559
CHANNEL 19	Phone: (216) 561-1919 Fax: (216) 991-1932
CHANNEL 25	Phone: (216) 398-2800 Fax: (216) 749-2560
CHANNEL 43	Phone: (216) 843-3440 Fax: (216) 843-6397

RADIO

WBKC	Phone: (440) 352-1460 Fax: (440) 357-7701
WELW	Phone: (440) 942-9359 Fax: (440) 953-0320
WHK	Phone: (216) 781-1420 Fax: (216) 781-5258

NEWSPAPERS

NEWS HERALD	Phone: (440) 951-0000 Fax: (440) 975-2293
CLEVELAND PLAIN DEALER (LAKE COUNTY OFFICE)	Phone: (440) 974-2100 Fax: (440) 999-5028

EMERGENCY OUTSIDE CONTACTS

Lubrizol

Painesville Plant

LUBRIZOL'S INDUSTRY NEIGHBORS

DYSON & SONS, INC.	Phone: (440) 352-4421
CINTAS	Office: (440) 352-4003
FIRST BRANDS CORP	Phone: (440) 352-6176
GIBBS WIRE & STEEL CO.	Phone: (440) 352-0611
ODOT GARAGE	Phone: (440) 354-2191
SAS RUBBER INC.	Phone: (440) 352-3321
CORE SYSTEMS	Phone: (440) 392-2431
FRANZ TOWING	Phone: (440) 352-3888
LAKE SCRAP	Phone: (440) 354-9929

PIPELINES

NITROGEN SUPPLY (OSAIR INC.) Phone: (440) 255-8238
(440) 951-9633

Primary Contact: John Magnusson (440) 667-1313 (cell)
(in case of emergencies) (216) 768-5103 (pager)
(440) 358-1544 (home)

Secondary Contact: Jack Butler (440) 667-7050 (cell)
(440) 980-4683 (pager)
(440) 352-2995 (home)

Third Contact: Tim Honkala (888) 591-0221 (pager)
(440) 635-0012 (home)

CONTRACTOR EMERGENCIES / INJURIES

CONTRACTOR

ABC DRIVEWAY	Office: (440) 352-2911
AYRSHIRE INC.	Office: (440) 286-9507 Jim Mascek
ATLAS INDUSTRIAL	Office: (440) 942-7315
BENTLEY EXCAVATING	Office: (440) 352-8495*
CHAPMAN ELECTRIC	Office: (440) 354-2310 Tom Chapman Cell: (440) 221-3181
CLC	Office: (216) 741-3351 Jeff Aquino
LIBERTY CONCRETE	Office: (216) 635-0020
MID-CONTINENT CONS.	Office: (440) 439-6100
PREFERRED PAINTERS	Office: (216) 587-0957
R&D CORPORATION	Office: (440) 358-9990
RELIANCE MECHANICAL	Office: (216) 391-1030
ADECCO	Office: (440) 974-1944
VECTOR TECHNICAL	Office: (440) 946-8800

*See page 9 for additional emergency contact nos. for Bentley Excavating

12/15/08

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EMERGENCY OUTSIDE CONTACTS

Lubrizol

Painesville Plant

SCHOOLS

BUCKEYE ELEMENTARY SCHOOL	Phone: (440) 352-2191
CHESTNUT ELEMENTARY SCHOOL	Phone: (440) 392-5350
ELM STREET ELEMENTARY	Phone: (440) 392-5520
HADDEN ELEMENTARY SCHOOL	Phone: (440) 354-4414
MAPLE ELEMENTARY SCHOOL	Phone: (440) 392-5440
MADISON AVENUE ELEM. SCHOOL	Phone: (440) 357-6171
McKINLEY ELEMENTARY SCHOOL	Phone: (440) 354-4982
MELRIDGE ELEMENTARY SCHOOL	Phone: (440) 352-3854
STERLING MORTON ELEMENTARY	Phone: (440) 257-5954
PAINESVILLE CHRISTIAN ACADEMY	Phone: (440) 352-4516
SUMMIT ACADEMY	Phone: (440) 358-0877
OUR SHEPHARD LUTHERAN ELEM.	Phone: (440) 357-7776
JOHN R. WILLIAMS JR. HIGH SCHOOL	Phone: (440) 352-3345
HERITAGE MIDDLE SCHOOL	Phone: (440) 392-5250
FAIRPORT HARDING HIGH SCHOOL	Phone: (440) 354-3592
HARVEY HIGH SCHOOL	Phone: (440) 392-5110
RIVERSIDE HIGH SCHOOL	Phone: (440) 352-3341
LAKE ERIE COLLEGE	Phone: (440) 352-3361

RAILROADS

CSX	Phone: (800) 327-5405, ext. 4085 (440) 992-1758
CSX "Police"	Phone: (800) 232-0144 DOT designation = 523806X (CSX uses for corner of Rt. 44 and plant)
NORFOLK & SOUTHERN	Phone: (800) 680-0400

EMERGENCY OUTSIDE CONTACTS



Painesville Plant

VENDORS

SAFETY/FIREFIGHTING SUPPLIES/FUEL

NATIONAL FOAM INC.	Phone: (610) 363-1400
SOUTHCOAST FIRE & SAFETY	Phone: (713) 649-6691
	FAX: (713) 649-6694
	Pager: (713) 648-2974
GRINNELL FIRE PROTECTION	Phone: (440) 783-0300
ABCO FIRE PROTECTION	Phone: (216) 433-7200
VALLEN SAFETY SUPPLY	Phone: (800) 364-1111 ext. 563
GENE PTACEK	Phone: (216) 651-8300
SUSQUEHANNA	Phone: (800) 494-0580
MELZERS FUEL SERVICE	Phone: (440) 354-3545
For after hours diesel fuel:	Andy: (440) 343-9365 or
	Rick: (440) 343-9362

EQUIPMENT/HEAVY EQUIPMENT

AIR TECHNOLOGIES	Phone: (440) 349-3900
AYRSHIRE:	Phone: (440) 286-9507 (office)
BENTLEY EXCAVATING	Phone: (440) 352-8495 (office)
Dennis Bentley	Home: (440) 259-3891 Cell: 477-9090
Mike Bentley	Home: (440) 259-3055 Cell: 477-7616
Ron Bentley	Home: (440) 259-3875 Cell: 477-7610
Doug Routzahn	Home: (440) 352-8495
O'CONNORS AUTO BODY	
& TOWING SERVICE	Phone: (440)-944-4400
(for lifting tank trucks)	(440) 585-1999
PRIME ENERGY(compressors)	Phone: (440) 926-1137
RJ CORMAN DERAILMENT	Phone: (800)-772-9091 (24 hours)
SERVICES (train derailment)	

C - Spill Response Notification Form

Spill Response Notification Form

SPILL RESPONSE NOTIFICATION FORM

Reporter's Name: _____
(Last) (First) (M.I.)

Position: _____

Phone Numbers: Day () _____
Evening () _____

Company: _____

Organization Type: _____

Address: _____
(Street)

(City) (State) (Zip)

Were materials discharged? Yes _____ No _____

Confidential? Yes _____ No _____

Meeting federal obligations to report? Yes _____ No _____ Date called: _____

Calling for responsible party? Yes _____ No _____ Time called: _____

Incident Description:

Source and/or cause of incident: _____

Date of incident: _____

Time of incident: _____ (AM/PM)

Incident address/location: _____

Nearest City: _____ State: _____

Distance from city: _____ Units of measure: _____ Direction from city: _____

Section: _____ Township: _____

Range: _____ Borough: _____

Container type: _____ Tank oil storage capacity: _____

Units of measure: _____

Facility Oil Storage Capacity: _____ Units of Measure: _____

SPILL RESPONSE NOTIFICATION FORM - Cont'd.

Facility Latitude: _____ Degrees _____ Minutes _____
Seconds _____
Facility Longitude: _____ Degrees _____ Minutes _____
Seconds _____

Material:

CHRIS Code	Discharged Quantity	Unit of Measure	Material Discharged in Water	Quantity	Unit of Measure

Response Action:

Actions taken to correct, control or mitigate incident: _____

Were there evacuations? Yes _____ No _____ Number evacuated: _____

Was there any damage? Yes _____ No _____ Approx. damage in dollars: \$ _____

Medium affected: _____

Description: _____

More information about medium: _____

Additional Information:

Any information about the incident not recorded elsewhere in the report: _____

Caller Notifications:

EPA? Yes _____ No _____ USCG? Yes _____ No _____ State? Yes _____ No _____

Other? Yes _____ No _____ Describe: _____

Impact:

Number of injuries: _____ Number of deaths: _____

D - Response Equipment List and Location

Spill Response Trailer
Inventory

Location	Supplies	S.A.P. Order Number
Left Top Shelf	100' of lake boom (2 - 50" sections attached)	Special order
Left Middle Shelf	100' of lake boom (2 - 50" sections, 2 - 25' sections attached)	Special order
Left Side Floor	Valves & hoses for inflatable sewer plugs	Special order
	85 gal. Salvage drum w/lid	Special order
	1 Box (6) - 3"x8' absorbent booms	3008397
	1 Box (6) - 3"x8' absorbent booms	3008397
	1 Box (4) - 3"x12' absorbent booms	3008430
	1Bag (4) - 8"x10' absorbent booms	3008399
	1Bag (4) - 8"x10' absorbent booms	3008399
	1Bag (1) - 8"x10' absorbent booms	3008399
	1Bag (4) - 8"x10' absorbent booms	3008399
	1 Inflatable sewer plug with flow through - 4" to 8"	Special order
	1 Inflatable sewer plug with flow through - 8" to 20"	Special order
	1 Inflatable sewer plug with flow through - 20" to 48"	Special order
Front Top Shelf	1 Bale (100) absorbent pads (17"x 19")	3008432
	2 Bags of absorbent (23lbs/bag) - Cell Sorb	3008119
Front Middle Shelf	1 Bale (100) absorbent pads (17" x 19")	3008432
	3 bags of absorbent (23 lbs/bag) - Cell Sorb	3008119
Front Bottom Shelf	9 Bags of absorbent (23 lbs/bag) - Cell Sorb	3008119
Front Floor	Large inflatable sewer bag, low pressure - 48" to 72"	Special order
	1 Box (6) - 3" x " absorbant booms	3008397
	1 Box (16) - 7" x 15" absorbant pillows	3008393

J:\OPRData\Ero\ero inspection forms.doc

J:\OPRData\Environmental\RCRA Sampling\Section G\Section G 2004\Exhibit G-10 (4-04)

CHECK LIST OF EQUIPMENT ON HAZMAT VEHICLE

Location	Area	Item	Qty.	Size	Check	D & T	By	No. of Items Removed	Date and Nature of Actions Taken
CABINET - A	A	MAP OF PLANT FIRE WATER LINES	1	D					
	A	MAP OF CITY WATER LINES	1	D					
	A	MAP OF TOPAGRAPHICAL	1	D					
	A	MAP OF ELECTRICAL	1	D					
	A	MAP OF SEWER SYSTEM	1	D					
CABINET - B	B	INVENTORY LIST BOOK	1						
	B	AAR EMERGENCY ACTION GUIDE	4						
	B	DOT HAND BOOKS	1						
	B	AAR SURFACE TRANSPORTATION	2						
	B	COAST GUARD CRIS MANUALS	3						
	B	SAX CHEMICAL REFERENCE BOOK	1						
	B	DRAGGAR SAMPLING KIT	1						
	B	BINOCULARS	1						
	B	EMERGENCY RESPONSE PLAN	1						
	B	HAZ. CHEMICALS DESK REF.	1						
	B	RESPIRATOR SELECTION GUIDE	1						
	B	FOAM APPLICATION GUIDE	1						
	B	ACGIH - TLV's BOOK	1						
	B	POCKET GUIDE TO HAZ. MAT'Ls	1						
	B	EMERGENCY CARE FOR HAZMAT	1						
CABINET - C	B	F.P. GUIDE TO HAZMAT	1						
	B	NFPA 49	1						
	B	DRAGER-TUBE HANDBOOK	1						
	C	TRAFFIC CONES	25						
	C	ROLL OF BANNER TAPE (RED)	1						
	C	ROLL OF BANNER TAPE (YELLOW)	1						
	C	RUBBERMAID COOLER	1	5 Gals.					
	C	JPB's TURNOUT GEAR	1 set						

[illegible]

CHECK LIST OF EQUIPMENT ON HAZMAT VEHICLE

Location	Area	Item	Qty.	Size	Check	D & T	By	No. of Items Removed	Date and Nature of Actions Taken
	DRUM	ROLL OF PVC PLASTIC	1						
	DRUM	SOLVEX (NITRILE) GLOVES	12 pr.	STD.					
	DRUM	SLIP-ON SHOE COVERS	12 pr.	STD.					
	DRUM	SPONGES	2						
	DRUM	TIDE SOAP	1 box	STD.					
	DRUM								
	DRUM								
	DRUM								
	G	HIGH PRESS. SURVIVAIR SCBA	2	60 mins.					
	G	WALKER	1	STD.					
CABINET-H	H	ROPE BAG - LIFE LINE (BLUE)	2	150'					
	H	ROPE BAG - SAFETY LINE(ORANGE)	2	150'					
	H	ROPE BAG - LIFE LINE (BLUE)	1	300'					
	H	ROPE BAG - SAFETY LINE(ORANGE)	1	300'					
	H	SKED STRETCHER	1	STD.					
	H	ROOF ROLLERS WITH CARABINER	2	STD.					
	H	SURVIVAIR SIGMA HIP PAC'S	2	10 MIN.					
	H	HOISTING SLING	1	2'					
	H	HOISTING SLING	1	6'					
	H	HOISTING SLING	1	8'					
	H	HOISTING LOOP	1	2'					
	H	RAPPELING EQUIPMENT BAG	2	STD.					
	EQ. BAG	CMC RESCUE HARNESSES	1 ea.	M, L, XL					
	EQ. BAG	ROPE EDGE GUARDS	2	2'					
	EQ. BAG	PICK OFF STRAPS - 5', 7' & 10'	1 ea.	5000#					
	EQ. BAG	PRUSSIK HITCHES	1	SM.					
	EQ. BAG	PRUSSIK HITCHES	2	MED.					
	EQ. BAG	PRUSSIK HITCHES	2	LG.					
	EQ. BAG	CARABINER WITH 5 SINGLE PULLEY	1	STD.					

CHECK LIST OF EQUIPMENT ON HAZMAT VEHICLE

Location	Area	Item	Qty.	Size	Check	D & T	By	No. of Items Removed	Date and Nature of Actions Taken
CABINET - I	EQ. BAC	CARABINER & D-PULLEY, 2WAY PULLEY	1 ea.	STD.					
	EQ. BAC	CARABINERS (BLACK)	5	STD.					
	EQ. BAC	ANCHOR PLATES & 6 CARABINERS	1 ea.	STD.					
	EQ. BAC	BRAKER BAR RACKS & CARABINER	3	STD.					
CABINET - J	I	LEVEL "A" - DISP. GAS TIGHT SUIT	2	XL					
	I	LEVEL "A" - DISP. FLASH SUIT	2	XL					
	I	LEVEL "A" - DISP. GAS TIGHT SUIT	2	XXL					
	I	LEVEL "A" - DISP. FLASH SUIT	2	XXL					
	J-1-A	SURVIVAIR FULL FACE MASKS	8	STD.					
	J-1-B	SURVIVAIR ORGANIC CANISTERS	16	STD.					
	J-1-C	SURVIVAIR HALF FACE MASKS	3	LG.					
	J-1-C	SURVIVAIR HALF FACE MASKS	4	MED.					
	J-1-C	SURVIVAIR HALF FACE MASKS	3	SM.					
	J-2-A	NEOPRENE GLOVES	18 pr.	LG.					
	J-2-B	CUTTING GLOVES	1 pr.	LG.					
	J-2-B	LEATHER GLOVES	4 pr.	LG.					
	J-2-B	SILVER SHIELD GLOVES	6 pr.	LG.					
	J-2-C	VITON GLOVES	12 pr.	STD.					
	J-3-A	MONOGOGGLES	8 pr.	STD.					
	J-3-B	WILSON SAFETY GLASSES	12 pr.	STD.					
CABINET - J	J-3-C	THROW-AWAY SPLASH SHIELDS	2	STD.					
	J-3-C	THERMAL SEAL CLEAR INSERTS	2	STD.					
	J-3-C	FACE SHIELDS FOR HARDHATS	8	STD.					
	J-4-A	RED & YELLOW BANNER TAPE	1 ea.	STD.					
	J-4-B	PAIL OPERNER	1	STD.					
	J-4-B	BAG OF SEAL FLEX	1	STD.					
	J-4-B	RED FLAGS	8	SM.					

CHECK LIST OF EQUIPMENT ON HAZMAT VEHICLE

Location	Area	Item	Qty.	Size	Check	D & T	By	No. of Items Removed	Date and Nature of Actions Taken
CABINET-M	M	TINGLEY (PVC / NITRILE) BOOTS	2 pr.	8's					
	M	TINGLEY (PVC / NITRILE) BOOTS	2 pr.	9's					
	M	TINGLEY (PVC / NITRILE) BOOTS	2 pr.	10's					
	M	TINGLEY (PVC / NITRILE) BOOTS	2 pr.	11's					
	M	TINGLEY (PVC / NITRILE) BOOTS	2 pr.	12's					
	M	TINGLEY (PVC / NITRILE) BOOTS	2 pr.	13's					
CABINET-N									
	N	IGLOO DRINKING COOLER / CUPS	1	5 GAL.					
	N	GATOR AID DRINK	1	CAN					
	N	BAG OF ASSORTED WEDGES	1	STD.					
	N	GARBAGE BAGS	1	BOX					
	N	GARDEN SPRAYER	1	2 GAL.					
	N	CHEMICAL SPLASH HOODS	2	STD.					
CABINET-O	O	SPILL CONTROL KIT DRUM	1	85 gal.					
	DRUM	3M ABSORBANT BOOMS	4	8'					
	DRUM	3M ABSORBANT BOOMS	4	12'					
	DRUM	3M ABSORBANT CHOPPED	4	bag					
	DRUM	3M ABSORBANT PADS	50	24" x 24"					
	DRUM	3M ABSORBANT PILLOWS	16	6" X 18"					
	O	HIGH PRESS. SURVIVAIR SCBA	2	60 mins.					
	O	AIR LINE SUPPLY HOSE	6	50'					
	O	WALKER	1	STD.					
CABINET-P ROLL-UP LEFT SIDE	TOP	DRUM REPAIR KIT	1	STD.					
	BOX	DRUM REPAIR - BALL PLUGS	1	1 1/8"					
	BOX	DRUM REPAIR - BALL PLUGS	1	2"					
	BOX	DRUM REPAIR - CHANNEL LOCKS	1	STD.					
	BOX	DRUM REPAIR - CRESCENT	1	10"					

CHECK LIST OF EQUIPMENT ON HAZARDOUS VEHICLE									
Location	Area	Item	Qty.	Size	Check	D & T	By	No. of Items Removed	Date and Nature of Actions Taken
	BOX	DRUM REPAIR - CRESCENT	1	12"					
	BOX	DRUM REPAIR - DOWELS/WEDGES	1 set						
	BOX	DRUM REPAIR - EPOXY PUTTY	1						
	BOX	DRUM REPAIR - FLAT PLUG	1	1 1/2"					
	BOX	DRUM REPAIR - FLAT PLUG	1	1 1/4"					
	BOX	DRUM REPAIR - FLAT PLUG	1	1"					
	BOX	DRUM REPAIR - FLAT PLUG	1	2 1/2"					
	BOX	DRUM REPAIR - FLAT PLUG	1	2"					
	BOX	DRUM REPAIR - FLAT PLUG	1	3"					
	BOX	DRUM REPAIR - GROUND CLAMP	1	36"					
	BOX	DRUM REPAIR - KNIFE	1	4"					
	BOX	DRUM REPAIR - MINI-STOPPERS	4	TAPERED					
	BOX	DRUM REPAIR - PLIERS	1	6"					
	BOX	DRUM REPAIR - RADIATOR CLAMP	8	VAR.					
	BOX	DRUM REPAIR - DUCT TAPE	1	2"					
	BOX	DRUM REPAIR - ELECT. TAPE	1	3/4"					
	BOX	DRUM REPAIR - NEOPRENE ROLL	1	4" x 12"					
	BOX	DRUM REPAIR - RUBBER Mallet	1	2 #					
	BOX	DRUM REPAIR - SCREWDRIVER	1	4"					
	BOX	DRUM REPAIR - SCREWDRIVER	1	6"					
	BOX	DRUM REPAIR - METAL SCREWS	2	1"					
	BOX	DRUM REPAIR - METAL SCREWS	3	1 1/4"					
	BOX	DRUM REPAIR - T-BOLT PATCHES	1	1" x 3"					
	BOX	DRUM REPAIR - T-BOLT PATCHES	1	3" x 3"					
	BOX	DRUM REPAIR - GOLF TEES	6	1 1/2"					
	TOP	AIRLINE DELIVERY SYSTEM BOX	1	4 outlet					
TOP	ROLL OF VISQUEEN PLASTIC	1	12' x 100'						
CABINET-P	TOP	PORTABLE FLOOD LIGHTS	2	500 watts					
ROLL-UP	TOP	AIRLINE-WORKUNIT to AIR BOX	1	20'					
LEFT SIDE	TOP	PIPE PATCH KIT	1	STD.					
continued	BOX	PIPE PATCH - COMB. WRENCH	1	1 1/16"					
	BOX	PPR PATCH - COMB. WRENCH	1	3/4"					
	BOX	PIPE PATCH - DEEP SOCKET	1	1 1/16"					
	BOX	PIPE PATCH - DEEP SOCKET	1	3/4"					
	BOX	PIPE PATCH - GAS LINE CLAMP	1	LG.					
	BOX	PIPE PATCH - PIPE CLAMP	1	1 1/2"					
	BOX	PIPE PATCH - PIPE CLAMP	1	1 1/4"					

CHECK LIST OF EQUIPMENT ON HAZMAT VEHICLE

Location	Area	Item	Qty.	Size	Check	D & T	By	No. of Items Removed	Date and Nature of Actions Taken
	BOX	PIPE PATCH - PIPE CLAMP	1	1"					
	BOX	PIPE PATCH - PIPE CLAMP	1	1 1/2"					
	BOX	PIPE PATCH - PIPE CLAMP	1	2 1/2"					
	BOX	PIPE PATCH - PIPE CLAMP	1	3 1/2"					
	BOX	PIPE PATCH - PIPE CLAMP	1	3"					
	BOX	PIPE PATCH - PIPE CLAMP	1	3/4"					
	BOX	PIPE PATCH - PIPE CLAMP	1	4"					
	BOX	PIPE PATCH - PIPE CLAMP	1	5"					
	BOX	PIPE PATCH - SOCKET EXTENSION	1	6"					
	BOX	PIPE PATCH - SOCKET WRENCH	1	3/8"					
	BOTTOM	CHLORINE "B" KIT (TANK CAR)	1	T/C					
	BOTTOM	CHLORINE "C" KIT (TON CYLINDER)	1	1 ton					
	BOTTOM	SALVAGE DRUM LIFTER - 3' SLING	1	85 gal.					
	BOTTOM	LARGE T/T DOME CLAMP	1	12" to 23"					
	BOTTOM	SMALL T/T DOME CLAMPS	set of 3						
	BOTTOM	SPILL STOPPER (DRAIN COVERS)	2	24" x 24"					
	BOTTOM	AIRLINE QUICK CONNECT PIGTAIL	1	12'					
	BOTTOM	DRUM TOURNIQUET	1	55 gal.					
CABINET-Q ROLL-UP RIGHT SIDE	TOP	220 volt ELECT. POWER SUPPLY	1	10'					
	TOP	ELECTRICAL EXTENSION CORD	1	50'					
	TOP	PIGTAIL (EXPLOSION x REGULAR)	1	2'					
	BOTTOM	HONDA ELECT. GENERATOR	1	20/240 v.					
	BOTTOM	GASOLINE CAN	1	1 gal.					

Spill Response Equipment

1000 feet of containment boom as well as various sizes of inflatable pipe plugs up to 72" diameter are available for immediate deployment by Lubrizol's Emergency Response Organization.

Spill containment equipment is stored on the HazMat vehicle that is centrally located within our plant. The containment boom and inflatable plugs are securely stored nearby for use if required. Lubrizol-Painesville does not have any Chemical Countermeasure Agents (dispersants) as described in the NCP product schedule.

Various absorbents and sand are available to mitigate spills. These are stored on the emergency hazardous materials vehicles, the fire trucks, and throughout the plant inside spill-kits.

The fire fighting and personnel protective equipment as listed in the attached equipment list is kept on the HazMat vehicle and fire trucks. In addition, each emergency responder has his or her own personal fire fighting bunker gear.

Other fire equipment is located in our on-site fire station and storage building. Also, there are fire hydrants, fire hose reels and fire hose houses located throughout the facility. Self-contained breathing apparatus' (SCBA's) are located in buildings throughout the facility as well.

Release Handling Capabilities and Limitations

The HazMat vehicle and associated spill containment equipment are capable of handling most small releases and limiting movement or containing medium sized releases. Medium to large size releases generally would require assistance from outside agencies.

E - Response Equipment Testing and Deployment

1.3.3 Response Equipment Testing/Deployment

As noted in section 1.8: Self-Inspection, Drills/Exercises, and Response Training, all equipment is tested in accordance with manufacturer's recommendations. If, during an incident, equipment requiring testing is used, testing and appropriate documentation is completed when post incident inspection and/or inventory takes place.

- Date of last inspection or equipment test: The emergency vehicles and corresponding equipment are checked regularly. More specifically, the spill response equipment (sewer plugs, inflatable plugs, and river/lake booms) were last inspected and tested as part of Emergency Response Organization (ERO) annual training (October 2009).
- Inspection frequency: The emergency vehicles and corresponding equipment are checked on a regular basis.
- Date of last deployment: The spill response equipment was last inspected and tested as part of our Emergency Response Organization (ERO) annual training (October 2009).
- Deployment frequency: As needed, but at a minimum, emergency response equipment is utilized during the ERO training sessions 6 times per year and at least once per calendar quarter.
- OSRO Certification: See Appendix II for selected OSRO certifications.

F - Facility Response Team

1.3.4 Response Personnel

Emergency Response Personnel List

See ERO Organization Personnel List (Tab 15) in the Lubrizol-Painesville Emergency Response Manual (Appendix I) for a diagram illustrating how the Emergency Response Organization (ERO) is organized and listing officers and their respective phone numbers. The remainder of the shift emergency responders, seventeen (17) minimum on each of four (4) shifts, are not listed due to regular movement from shift to shift. Any documentation would quickly be outdated.

Response Time:

Emergency responders, including officers, are available immediately, 24 hours per day, 365 days per year. Patrick Shannon, the Emergency Response Supervisor, has a response time of 25 minutes during off-hours.

Responsibilities:

Each ERO responder's responsibility is to respond to an alarm and/or spill immediately. They are then trained to keep an emergency under control and mitigate any problems through the use of spill containment practices and/or fire-fighting techniques.

Type and date of response training:

Emergency Response (ERO) personnel receive extensive training annually. ERO training sessions are 6 times per year and at least once per calendar quarter.

In summary, ERO personnel receive the following training:

- Firefighting - 36 hour basic course
- First responder awareness
- First responder operational
- Hazardous materials technician

In addition, ERO officers receive incident command, hazardous materials incident command and courses dealing with the media.

Emergency Response Contractors

Lubrizol uses the following contractors as needed, to assist in spill clean-up/response. References to Oil Spill Response Organizations (OSRO) in this plan indicate either of these companies:

Inland Waters of Ohio

2195 Drydock Avenue
Cleveland, Ohio 44113
216-861-3949

24-hour emergency number: 800- 869-3949

Response time is approximately one to two hours to Lubrizol-Painesville.

Chemtron Corporation

35850 Schneider Court
Avon, OH 44011
440-933-6348

24-hour emergency number: 440-937-5950

Response time is approximately one to two hours to Lubrizol-Painesville.

Evidence of Response Capability and contractual agreements:

The capabilities of OSRO and contractual agreements are detailed in "OPA '90 Resources" (Appendix II). OSRO can respond to our facility's needs generally within one (1) to two (2) hours.

Facility Response Team List

In Tabs 5 & 6 of Lubrizol-Painesville's Emergency Response Manual (Appendix I) is an illustration of the ERO organizational structure for each of the four- (4) shifts.

Response time:

Response to an emergency by way of an emergency alarm and/or radio communication, such as an oil release, is immediate because the plant is always in operation.

G - Evacuation Plan

Facility-Wide Evacuation Plan

When evaluating a need for evacuation all of the following factors are considered:

- Location of stored materials – An evaluation is made as to the risk of exposure in the event of a spill. Each designated evacuation assembly point is located such that it is a safe distance away from any stored hazardous materials. Factors such as wind speed and direction will be used to determine the best mustering point.
- Hazard imposed by spilled material – Each raw material and product in the facility has a Material Safety Data Sheet (MSDS). This information, along with product knowledge, experience, and training is used to safely evaluate the situation and safely evacuate any personnel that may be impacted.
- Spill flow direction – Spill flow direction is determined immediately. This is used to anticipate where the material will flow such that the appropriate evacuation assembly point can be used. Also, see section 1.9, Diagram 3.
- Prevailing wind direction and speed – Instrumentation and windsocks are located throughout the facility as well as off site to determine wind speed and direction. This critical information and is used to determine evacuation routes.
- Water currents, tides, or wave conditions (if applicable) – Not-applicable.
- Arrival route of emergency response personnel and response equipment - Instrumentation and windsocks are located throughout the facility as well as off site to determine wind speed and direction. These are used to designate a safe arrival route.
- Evacuation routes – Evacuation assembly points can be found on an illustration in Lubrizol-Painesville's Emergency Response Plan (Appendix I) under Tab 10. Safe routes to the assembly points via plant roadways will be determined by the incident commander.
- Alternative routes of evacuation – All of the above considerations are considered in determining which of the (3) evacuation assembly points and routes will be used.
- Transportation of injured - Any injured personnel would be transported via Lubrizol-Painesville's rescue squad. Employee drivers are certified EMT's and/or paramedics and those injured

would be brought to the local hospital, Tripoint Medical Center. The rescue squad has radio and phone contact with the hospital while en route.

- Locations of alarm/notification systems – There are numerous pull alarms throughout the facility, both inside and outside of buildings. Alarms are all tied into the central security office where an automated notification over a PA system is given as to the exact location of an emergency. In addition, hand-held radios and telephones can be used.
- Centralized check-in area for roll call – A designated supervisor from all departments will make a roll call at the evacuation assembly points used.
- Mitigation command center location – An appropriate staging area will be organized at the scene of an emergency. Also, depending on the incident, an emergency control center is set up to aid in the management of the incident. See Lubrizol-Painesville's Emergency Response Plan (Appendix I), Tab 13 for details.
- Location of shelter at facility – Shelter-in-Place locations can be found on an illustration in Lubrizol-Painesville's Emergency Response Plan (Appendix I) under Tab 10.

Community Evacuation Plans

The Incident Commander will determine if the incident may or will affect the community (level 2 or 3 emergency, respectively) and determine if the Painesville Township Fire Department should be notified and placed on stand-by or to respond to the emergency and if it is necessary to activate the County M.A.B.A.S. to respond. See Lubrizol-Painesville's Emergency Response Plan (Appendix I), Tab 4 for details.

H - Immediate Actions

1.7 PLAN IMPLEMENTATION

1.7.1 Response Resources

As indicated in Section 1.5 Discharge Scenarios, Lubrizol's Emergency Response Organization will respond immediately to all spills. Lubrizol has available, on-site, the following to control spills at the facility:

- Bulk sorbent material
- Absorbent pillows
- Portable pumps
- Storage containers
- Tank trucks
- Empty drums
- Absorbent booms
- Inflatable pipe plugs of various sizes to stop flow in drain tiles up to 72" diameter
- Overpack drums
- Sand
- Shovels
- Dump truck
- Backhoe/loader
- Personnel safety equipment
- 1000' of containment boom

A detailed list of the spill control materials stored on Lubrizol's HazMat vehicle is listed in Section 1.3.2 Equipment. The selected OSRO will be contacted to help contain, recover and store the spilled material. Contractor capabilities, available equipment and response times are included in the contractor's response documentation found in Appendix II.

The members of Lubrizol's Emergency Response Organization (ERO) are trained to handle all types of emergencies including spills. Section 1.8.3 Training and Meeting Logs details member training. The qualifications of contractor employees are included in the contractor's response documentation found in Appendix II.

The selected OSRO has individuals on staff that have years of practical and theoretical experience. These individuals can be consulted if expert advice is required.

1.7.2 Disposal Plans

The following page (Section G-4f and G-4g) from the facility's RCRA Contingency Plan addresses disposal of released/spilled materials. All wastes produced as a result of a spill would be characterized as required by 40 CFR261 prior to treatment or disposal. As indicated in the pages from the RCRA Contingency Plan, the only on-site treatment which could take place would be incineration and/or phase separation. Non-hazardous aqueous waste from a spill clean-up may be treated in the process sewer system/POTW, if it is consistent with the facility's

Industrial Discharge Permit. For wastes that cannot be handled on-site, Lubrizol uses the following facilities to properly treat and/or dispose of wastes.

Heritage – WTI, Inc. D.B.A. WTI
1250 St. George St.
East Liverpool, Ohio 43920
EPA I.D. # OHD980613541

Systech Environmental Corp.
P.O. Box 166
11397 County Rd. 176
Paulding, OH 45879
EPA I.D. # OHD005048947

Systech Environmental Corp.
1420 S. Cement Rd.
Fredonia, KS 66736
EPA I.D. # KSD980633259

Wastes produced as a result of a release/spill could be sent off-site to one or more of the above listed TSD's if necessary for proper treatment and disposal. Other approved TSDF's may be used based on the specific waste generated and approved disposal methods applicable to the waste.

1.7.3 Containment and Drainage Planning

Facility containment and drainage planning is detailed in the Lubrizol-Painesville's SPCC Plan (Appendix III). SPCC-required inspection and monitoring information can be found in the Lubrizol-Painesville's SPCC Plan (Appendix III).

Off-site containment and drainage planning has resulted in the construction of a map which illustrates the plant, Blackbrook Creek and Mentor Marsh. Information including the location of culvert pipes and corresponding dimensions are shown for use during a spill incident. On-going training will continue and involves local fire departments in anticipation of providing assistance during a spill incident. It is important that this information be readily available to responders during an incident. A copy of the Site Drainage Plan discussed above can be found in 1.9 Diagrams.

G-4f Storage and Treatment of Released Material

OAC 3745-54-56 (G)

After an emergency, qualified Lubrizol personnel will provide for storing or disposing of the recovered waste, contaminated water, or any other material that results from a release, fire, or explosion at the facility, according to all applicable regulations.

Any spilled materials or recovered wastes will be promptly put into either water tight containers or steel drums depending on the nature of the waste. These storage containers will be stored outside the area where the emergency occurred so that they cannot cause any additional problems to the cleanup or repair work needed at the site of the emergency. All recovered wastes that are classified as ignitable will be stored only in areas of the facility that are designed for flammable/ignitable materials. All recovered wastes will be segregated from any other incompatible or reactive materials. All containers will be protected from further dilution by rainfall or other airborne contaminants.

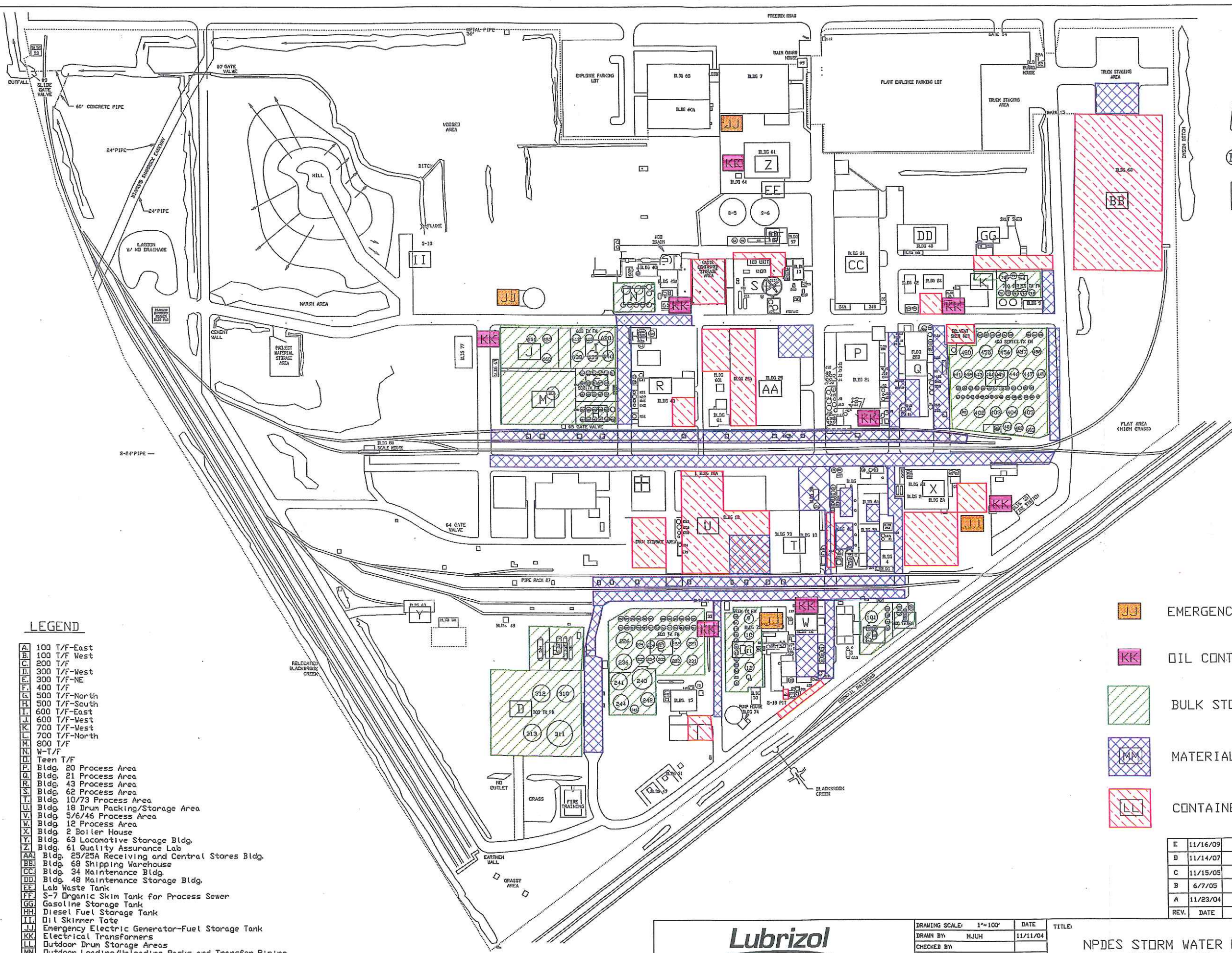
The only on-site treatment will be incineration, phase separation, neutralization or blending. Procedures for the evaluation of released hazardous waste materials prior to on-site incineration, including evaluations for compatibility, are described in Section C-2, the Waste Analysis Plan. If wastes cannot be incinerated on-site, they will be evaluated, manifested, and transported off-site to an appropriately permitted TSDF. Off-site treatment includes, but is not limited to, incineration, fuels substitution, and organics recovery. The specific location of this TSDF will be determined depending on the type and nature of the material.

G-4g Incompatible Waste

OAC 3745-54-56 (H)(1)

All potentially incompatible waste materials are reviewed by qualified Lubrizol personnel, prior to treatment, storage or disposal. Wastes from emergency response cleanups will generally be stored separately from process wastes. Based on the assessment of wastes resulting from emergency operations, sampling and analysis (if appropriate) will be conducted in accordance with SW-846 methodologies. No wastes that may be incompatible with the released material will be treated, stored or disposed of until cleanup procedures are complete.

I - Facility Diagram




LEGEND

- A 100 T/F-East
- B 100 T/F West
- C 200 T/F
- D 300 T/F-West
- E 300 T/F-NE
- F 400 T/F
- G 500 T/F-North
- H 500 T/F-South
- I 600 T/F-East
- J 600 T/F-West
- K 700 T/F-West
- L 700 T/F-North
- M 800 T/F
- N W-T/F
- O Teen T/F
- P Bldg. 20 Process Area
- Q Bldg. 21 Process Area
- R Bldg. 43 Process Area
- S Bldg. 62 Process Area
- T Bldg. 10/73 Process Area
- U Bldg. 19 Drum Packing/Storage Area
- V Bldg. 5/6/46 Process Area
- W Bldg. 12 Process Area
- X Bldg. 2 Boiler House
- Y Bldg. 63 Locomotive Storage Bldg.
- Z Bldg. 61 Quality Assurance Lab
- AA Bldg. 25/25A Receiving and Central Stores Bldg.
- BB Bldg. 68 Shipping Warehouse
- CC Bldg. 34 Maintenance Bldg.
- DD Bldg. 48 Maintenance Storage Bldg.
- EE Lab Waste Tank
- FF S-7 Organic Skim Tank for Process Sewer
- GG Gasoline Storage Tank
- HH Diesel Fuel Storage Tank
- II Oil Skinner Tote
- JJ Emergency Electric Generator-Fuel Storage Tank
- KK Electrical Transformers
- LL Outdoor Drum Storage Areas
- MM Outdoor Loading/Unloading Racks and Transfer Piping

LEGEND

- JJ EMERGENCY GENERATOR FUEL OIL
- KK OIL CONTAINING ELECTRICAL XFMR
- BULK STORAGE AREAS
- MM MATERIAL LOADING AND UNLOADING
- LL CONTAINER STORAGE AREAS

E	11/16/09	UPDATED DRAWING BACKGROUND	MJUH	GEND
D	11/14/07	UPDATED DRAWING BACKGROUND	MJUH	GEND
C	11/15/05	ADDED SLIDE GATE VALVE #9 PER PV-858	MJUH	CAJ
B	6/7/05	ADDED SECOND LEGEND	MJUH	CAJ
A	11/23/04	ISSUED WITH PERMIT APPLICATION	MJUH	CAJ
REV.	DATE	REVISION DESCRIPTION	DRAWN	APP.



199 FREEDOM RD.
PAINESVILLE PLANT
PAINESVILLE, OHIO

DRAWING SCALE: 1"=100'

DATE: 11/11/04

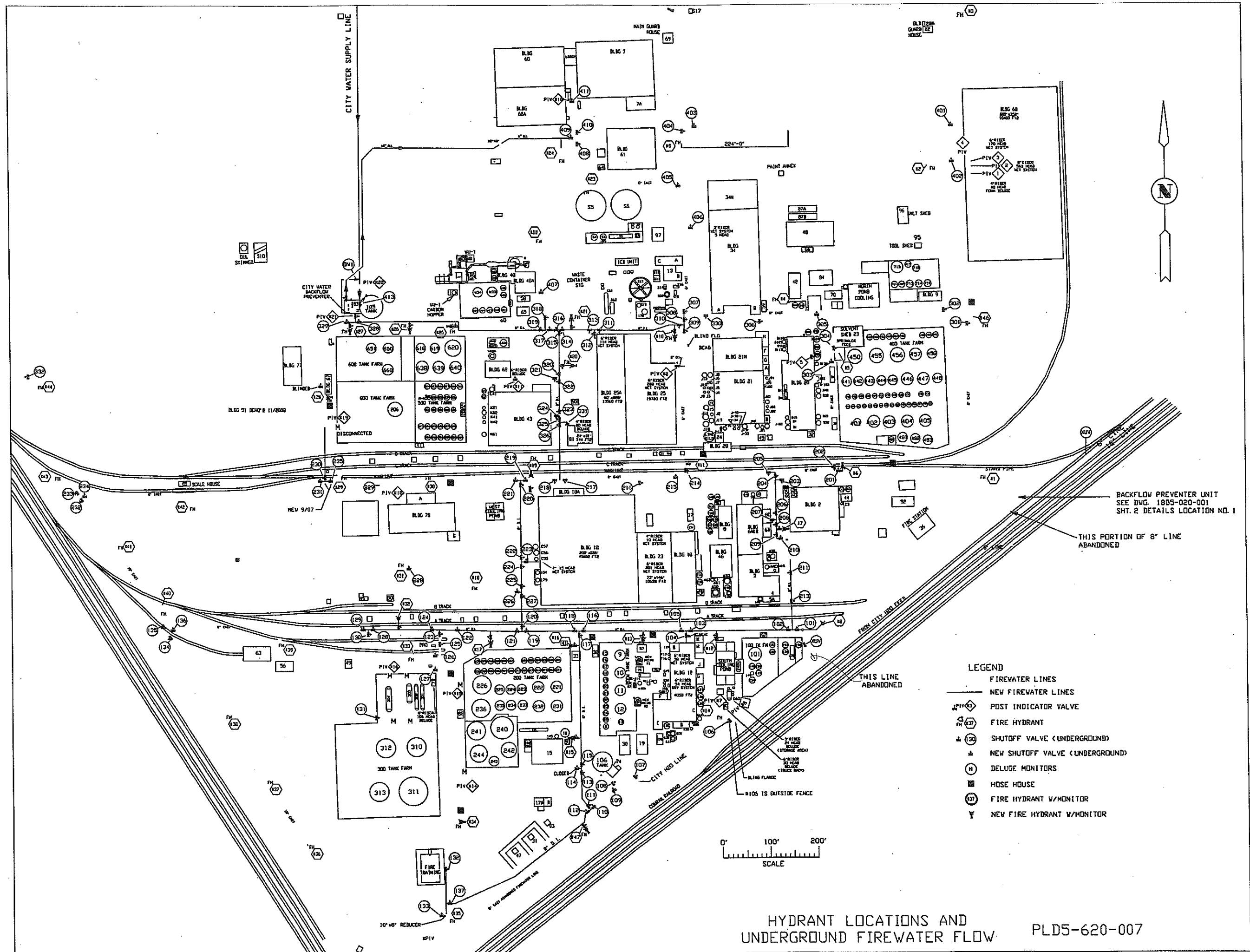
TITLE: NPDES STORM WATER MAP
DRAWING #3

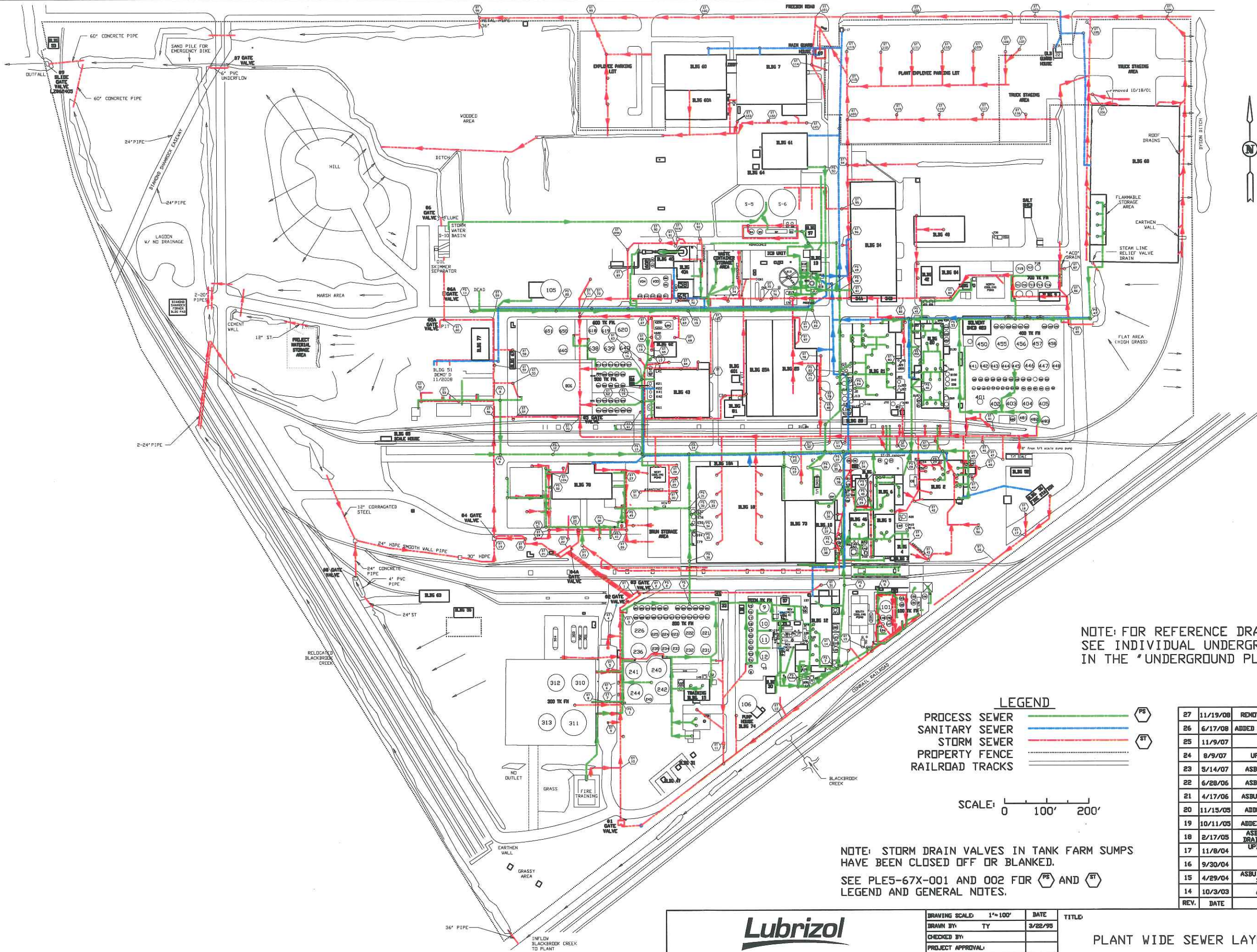
PROJECT NUMBER:

DRAWING NO.
PLD5-131-003
3 OF 4

REV. E

CADD NUMBER: PL131003





NOTE: FOR REFERENCE DRAWINGS
SEE INDIVIDUAL UNDERGROUND PLOT DRAWINGS
IN THE "UNDERGROUND PLOTS" FOLDER


LEGEND

PROCESS SEWER ——— PS
SANITARY SEWER ——— SS
STORM SEWER ——— ST
PROPERTY FENCE - - - - -
RAILROAD TRACKS ———

SCALE: 0 100' 200'

NOTE: STORM DRAIN VALVES IN TANK FARM SUMPS
HAVE BEEN CLOSED OFF OR BLANKED.
SEE PLE5-67X-001 AND 002 FOR PS AND ST
LEGEND AND GENERAL NOTES.

27	11/19/08	REMOVED BLDG 51 & ASSOCIATED EQUIPMENT	NJUH	
26	6/17/08	ADDED 146, D-115 & D-125 & NEW FUME INCINS	NJUH	
25	11/9/07	ADDED T/T STAGING & 178 TANK	NJUH	EGZ
24	8/9/07	UPDATED STORM SEWER NORTH OF WHRI	NJUH	EGZ
23	5/14/07	ASBUILT PER PV-10250 (MOCK2007083)	NJUH	MISG
22	6/28/06	ASBUILT PER PV-881 (BLDG 20 PS-45A)	NJUH	MISG
21	4/17/06	ASBUILT PER PV-818 (REPLACED S-18 PIT)	NJUH	EGZ
20	11/15/05	ADDED SLIDE GATE VALVE #9 PER PV-858	NJUH	MISG
19	10/11/05	ADDED NOTE FOR EMERGENCY DIKE SANDPILE	NJUH	CAJ
18	2/17/05	ASBUILT UPDATE (ADDED PROCESS SEWER DRAINS IN BLDG 68 FLAMMABLE STG AREA)	NJUH	PTS
17	11/8/04	UPDATED STORM WATER OUTFALL POINTS AND DRAINAGE BASINS	NJUH	CAJ
16	9/30/04	UPDATED PER PV-7322 ADDED 24" GATE VALVE #8	NJUH	
15	4/29/04	ASBUILT UPDATE PROCESS SEWER LINE NEAR SPECIAL PRODUCTS BLDG AT PS-30	NJUH	
14	10/3/03	ADDED "ACD" DRAIN AT 700 TK FM	NJUH	
REV.	DATE	REVISION DESCRIPTION	DRAWN	APP.



PAINESVILLE PLANT

DRAWING SCALE: 1"=100'	DATE: 3/22/98	TITLE: PLANT WIDE SEWER LAYOUT
DRAWN BY: TY		
CHECKED BY:		
PROJECT APPROVAL:		
C.E. APPROVAL:		
PROJECT NUMBER:		

DRAWING NO. PLD5-612-068

CADD NUMBER: PL512058

REV. 27

SHELTER IN PLACE LOCATIONS				
Shelter In Place	Phone	Building	Map	
Location	Extension	Number	Location	
1 Office Area	N/A	60A	L-2	
2 Dispensary	3745	7	M-2	
2a Classroom A&B	3845	7	M-2	
3 Office Area	3712	68	R-3	
4 QA Conference Room	3826	61	M-3	
5 Old Paint Shop Bldg. 34	3631	34	O-4	
6 Control Room	3797	40	K-5	
7 Control Room	3767	97	N-5	
8 Pump Shop Clean Room	3611	34	N-5	
9 Electrical Shop	3838	34	N-5	
10 Instrument Shop	3776	34	O-5	
11 Breakroom/Lab	3678	20	O-6	
12 R/R Scale House	3803	85	G-8	
13 Control Room	3627	43	K-7	
14 Control Room	3854	81	L-7	
15 Control Room/Break Area	3723	21	O-7	
16 400 Tank Farm Office	3760	39	P-7	
17 Office Area (18 classroom)	3931	18	L-9	
17a Blend Area break room	3646	18	L-9	
18 Break Area	3714	6	O-9	
19 Control Room	3713	2	P-9	
20 T/T Scale House	3766	52	Q-8	
21 Control Room	3732	10	N-9	
22 Control Room	3637	46	N-10	
23 200 Tank Farm Office	3610	38	L-11	
24 Control Room	3716	12	N-11	
25 Weight Room	3898	88	O-0	
26 Receiving/Stores/Office area	3690/3719	25	N-7	
27 Main Security Office	3810	69	N-1	
28 Training Building	3710	15	L-12	

KEY

SHELTER IN PLACE

EVACUATION ASSEMBLY POINTS

LIFE FLIGHT HELICOPTER LANDING ZONES

REVISED

DATE

BY

12/14/09

REVISED BLDG 61 LOCATION

MJUH

APPROVED

DATE

BY

12/9/08

MOVED EVAC & SPI TO SEPARATE DRAWING

MJUH

REVISIONS

DATE

BY

DESCRIPTION

2

0/14/09

REVISED BLDG 61 LOCATION

MJUH

mjsa

1

12/9/08

MOVED EVAC & SPI TO SEPARATE DRAWING

MJUH

PROJECT NO.

PLD5-960-026

DATE

12/14/09

BY

MJUH

CHECKED

mjsa

DESIGNED

DATE

BY

12/14/09

REVISED BLDG 61 LOCATION

MJUH

APPROVED

DATE

BY

12/9/08

MOVED EVAC & SPI TO SEPARATE DRAWING

MJUH

PROJECT NO.

PLD5-960-026

DATE

12/14/09

BY

MJUH

CHECKED

mjsa

DESIGNED

DATE

BY

12/14/09

REVISED BLDG 61 LOCATION

MJUH

APPROVED

DATE

BY

12/9/08

MOVED EVAC & SPI TO SEPARATE DRAWING

MJUH

PROJECT NO.

PLD5-960-026

DATE

12/14/09

BY

MJUH

CHECKED

mjsa

DESIGNED

DATE

BY

12/14/09

REVISED BLDG 61 LOCATION

MJUH

APPROVED

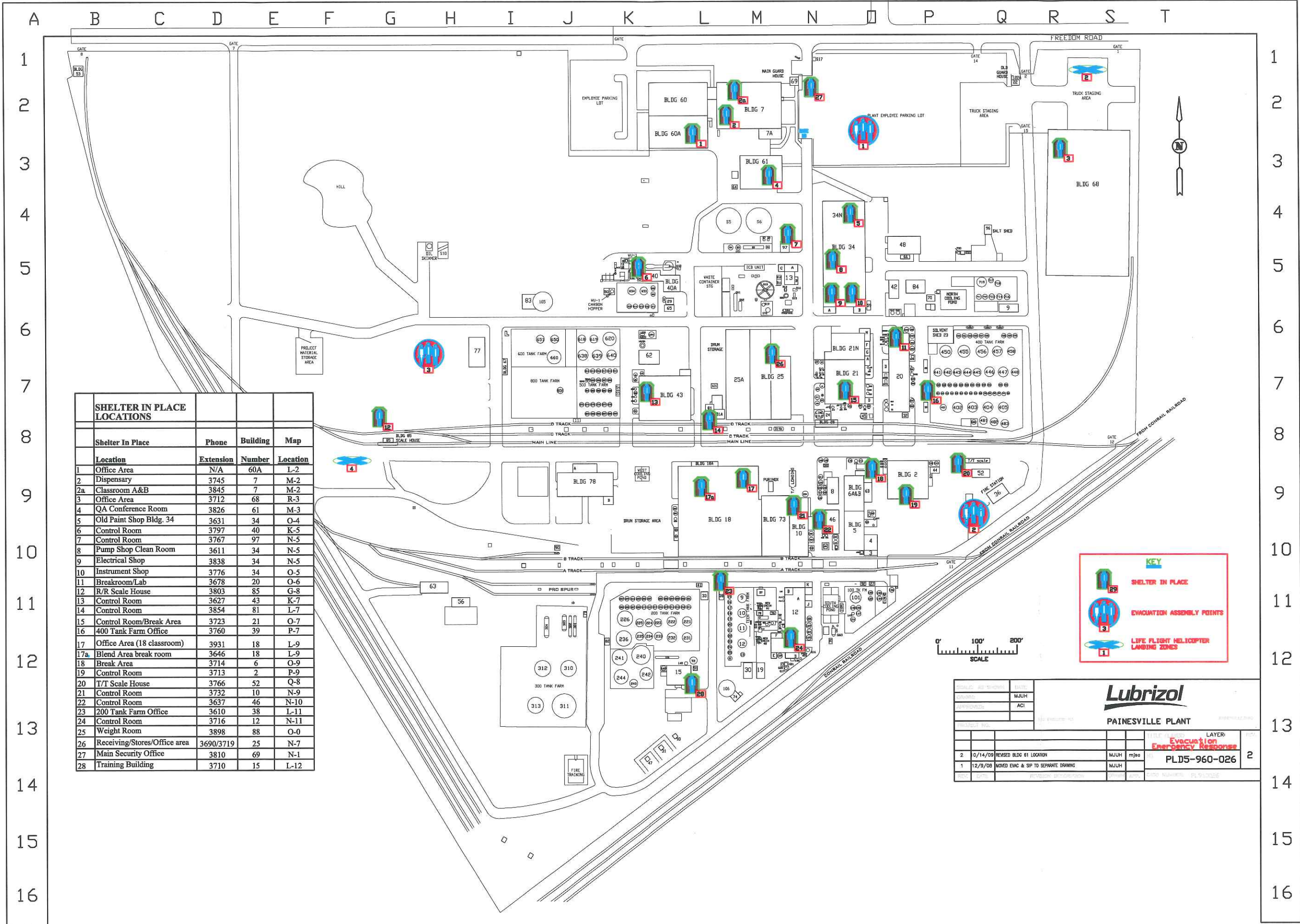
DATE

BY

12/9/08

MOVED EVAC & SPI TO SEPARATE DRAWING

MJUH





Painesville Plant

July 1, 1996

Copyright 1996 by: J. Berra Engineering, Inc.
Houston, TX (713) 447-8300

SITE DRAINAGE PLAN



KEY

- 1) Property Lines are noted in **RED**.
- 2) See location of Gate Valve and Walk Bridge in vicinity of Building 53.
- 3) **---** Indicates Concrete Culvert Pipe.
 - A** - 42" I.D.
 - B** - 24" X 48" I.D.
 - C** - 40" I.D.
 - D** - 24" X 36" I.D. (2)
 - E** - 54" I.D.
 - F** - 72" I.D.
 - G** - 72" I.D.
 - H** - 58" X 86" I.D.
 - I** - 60" X 96" Box Culvert
 - J** - 84" I.D.
 - K** - 54" I.D.
- 4) Containment Devices and Materials may be placed at the following 4 Culvert Points:
 - 1) **F**
 - 2) **H**
 - 3) **J**
 - 4) **K**



OIL POLLUTION ACT OF 1990
MANUAL

1.2 FACILITY INFORMATION

Facility Name and Location

Latitude and Longitude

Wellhead Protection Area

Owner/Operator

Qualified Individual (Emergency Response Coordinator)

Date of Oil Storage Start-up

Current Operation

Date and Type of Substantial Expansion

1.2 FACILITY INFORMATION

Facility Name:	The Lubrizol Corporation - Painesville Plant
Location:	155 Freedom Road Painesville Township Lake County Ohio 44077 (440) 357-7064 One-half mile northwest of Painesville City
Latitude:	N41° 43' 13"
Longitude:	W81° 16' 25"
Wellhead Protection Area:	Not Applicable
Owner:	The Lubrizol Corporation 29400 Lakeland Boulevard Wickliffe Lake County Ohio 44092 (440) 943-1200
Operator:	The Lubrizol Corporation - Painesville Plant (Same as Facility Name and Location)
Qualified Individual (Emergency Response Coordinator):	See Section 1.3.4 Response Personnel for specific explanations and lists of emergency coordinators.
Designated person accountable for oil spill response at the facility is:	Patrick R. Shannon Work Phone: (440) 347-3953 Home Address: 6801 South Ridge Road Unionville, Ohio 44088 Home Phone: (440) 228-1859 Emergency Phone (Cell): (440) 343-7493 Training (as of 2009): 10 years as Fire Chief, 20 years as a member of the Emergency Response Organization. 3.5 years as a Shift Fire Chief. 20 years as a Member of a Municipal Fire Department (3 years at the rank of Lieutenant). State Certified Fire and EMT Instructor. Ohio Fire Academy Hazardous Materials Technician Instructor.
Date of Oil Storage Startup:	1956 Initial purchase of property

Facility Type/Operation: Performance Chemical Manufacturer
Manufactures additives for motor oils and fuels
SIC Code: 2869

Substantial Expansion History:

- Facility is current as described in subsequent sections of this Spill Prevention and Response Manual.
- No substantial expansions in last ten (10) years.

OIL POLLUTION ACT OF 1990
MANUAL

1.3 EMERGENCY RESPONSE INFORMATION

1.3.1 Notification

Phone List:

National Response Center
Facility Response Coordinator
Facility Response Team
On-Scene Coordinator (OSC)
Area Committee
Local Response Team
Fire Marshall
State Emergency Response Commission
State Police
Local Emergency Planning Committee
Local Water Supply System
Factories/Utilities with water intakes
Trustees of Sensitive Areas
Weather Report
Local Television/Radio Stations for Evacuation Notification
Hospitals

Spill Response Notification Form:

Reporters' Names
Company Information
Incident Description
Material
Response Action
Impact

1.3.2 Response Equipment List

1.3.3 Response Equipment Testing and Deployment

1.3.4 Response Personnel

Emergency Response Personnel List
Emergency Response Contractors

1.3.5 Evacuation Plans

Facility-Wide Evacuation Plan
Community Evacuation Plans

1.3.6 Qualified Individual's Duties

1.3.1 Emergency Notification

Phone List

**Refer to Tab 14 of Lubrizol-Painesville's Emergency Response
Plan (Appendix I)**

1.3.1 Emergency Notification

Spill Response Notification Form

SPILL RESPONSE NOTIFICATION FORM

Reporter's Name: _____
(Last) (First) (M.I.)

Position: _____

Phone Numbers: Day () _____
Evening () _____

Company: _____

Organization Type: _____

Address: _____
(Street)

(City) (State) (Zip)

Were materials discharged? Yes _____ No _____

Confidential? Yes _____ No _____

Meeting federal obligations to report? Yes _____ No _____ Date called: _____

Calling for responsible party? Yes _____ No _____ Time called: _____

Incident Description:

Source and/or cause of incident: _____

Date of incident: _____

Time of incident: _____ (AM/PM)

Incident address/location: _____

Nearest City: _____ State: _____

Distance from city: _____ Units of measure: _____ Direction from city: _____

Section: _____ Township: _____

Range: _____ Borough: _____

Container type: _____ Tank oil storage capacity: _____

Units of measure: _____

Facility Oil Storage Capacity: _____ Units of Measure: _____

SPILL RESPONSE NOTIFICATION FORM - Cont'd.

Facility Latitude: _____ Degrees _____ Minutes _____
Seconds
Facility Longitude: _____ Degrees _____ Minutes _____
Seconds

Material:

CHRIS Code	Discharged Quantity	Unit of Measure	Material Discharged in Water	Quantity	Unit of Measure

Response Action:

Actions taken to correct, control or mitigate incident: _____

Were there evacuations? Yes _____ No _____ Number evacuated: _____

Was there any damage? Yes _____ No _____ Approx. damage in dollars: \$ _____

Medium affected: _____

Description: _____

More information about medium: _____

Additional Information:

Any information about the incident not recorded elsewhere in the report: _____

Caller Notifications:

EPA? Yes _____ No _____ USCG? Yes _____ No _____ State? Yes _____ No _____

Other? Yes _____ No _____ Describe: _____

Impact:

Number of injuries: _____ Number of deaths: _____

1.3.2 Response Equipment List

Spill Response Trailer
Inventory

Location	Supplies	S.A.P. Order Number
Left Top Shelf	100' of lake boom (2 - 50" sections attached)	Special order
Left Middle Shelf	100' of lake boom (2 - 50" sections, 2 - 25' sections attached)	Special order
Left Side Floor	Valves & hoses for inflatable sewer plugs	Special order
	85 gal. Salvage drum w/lid	Special order
	1 Box (6) - 3"x8' absorbent booms	3008397
	1 Box (6) - 3"x8' absorbent booms	3008397
	1 Box (4) - 3"x12' absorbent booms	3008430
	1Bag (4) - 8"x10' absorbent booms	3008399
	1Bag (4) - 8"x10' absorbent booms	3008399
	1Bag (1) - 8"x10' absorbent booms	3008399
	1Bag (4) - 8"x10' absorbent booms	3008399
	1 Inflatable sewer plug with flow through - 4" to 8"	Special order
	1 Inflatable sewer plug with flow through - 8" to 20"	Special order
	1 Inflatable sewer plug with flow through - 20" to 48"	Special order
Front Top Shelf	1 Bale (100) absorbent pads (17"x 19")	3008432
	2 Bags of absorbent (23lbs/bag) - Cell Sorb	3008119
Front Middle Shelf	1 Bale (100) absorbent pads (17" x 19")	3008432
	3 bags of absorbent (23 lbs/bag) - Cell Sorb	3008119
Front Bottom Shelf	9 Bags of absorbent (23 lbs/bag) - Cell Sorb	3008119
Front Floor	Large inflatable sewer bag, low pressure - 48" to 72"	Special order
	1 Box (6) - 3" x " absorbant booms	3008397
	1 Box (16) - 7" x 15" absorbant pillows	3008393

J:\OPRData\Ero\ero inspection forms.doc

J:\OPRData\Environmental\RCRA Sampling\Section G\Section G 2004\Exhibit G-10 (4-04)

CHECK LIST OF EQUIPMENT ON HAZMAT VEHICLE

Location	Area	Item	Qty.	Size	Check	D & T	By	No. of Items Removed	Date and Nature of Actions Taken
CABINET - A	A	MAP OF PLANT FIRE WATER LINES	1	D					
	A	MAP OF CITY WATER LINES	1	D					
	A	MAP OF TOPOGRAPHICAL	1	D					
	A	MAP OF ELECTRICAL	1	D					
	A	MAP OF SEWER SYSTEM	1	D					
CABINET - B	B	INVENTORY LIST BOOK	1						
	B	AAR EMERGENCY ACTION GUIDE	4						
	B	DOT HAND BOOKS	1						
	B	AAR SURFACE TRANSPORTATION	2						
	B	COAST GUARD CRIS MANUALS	3						
	B	SAX CHEMICAL REFERENCE BOOK	1						
	B	DRAUGAR SAMPLING KIT	1						
	B	BINOCULARS	1						
	B	EMERGENCY RESPONSE PLAN	1						
	B	HAZ. CHEMICALS DESK REF.	1						
CABINET - C	C	TRAFFIC CONES	25						
	C	ROLL OF BANNER TAPE (RED)	1						
	C	ROLL OF BANNER TAPE (YELLOW)	1						
	C	RUBBERMAID COOLER	1	5 Gals.					
	C	JPB's TURNOUT GEAR	1 set						

CHECK LIST OF EQUIPMENT ON HAZMAT VEHICLE

Location	Area	Item	Qty.	Size	Check	D & T	By	No. of Items Removed	Date and Nature of Actions Taken
CABINET - D DRAWER	TOP	COMMAND PACKETS/CLIPBOARDS							
	TOP	SPARE COMMAND PACKETS							
CABINET - E DRAWER	BOTTOM Command	COMMAND VESTS BAG	1						
		COMMAND OFFICER VEST	1						
		SAFETY OFFICER VEST	1						
		HAZMAT SAFETY OFFICER VEST	1						
		FIRE OFFICER VEST	1						
		DECON OFFICER VEST	1						
		SECTOR OFFICERS VESTS	4						
	BOTTOM	RESCUE VESTS BAG	1						
	Rescue	MEDICAL OFFICER VEST	1						
		TRIAGE OFFICER VEST	1						
		TREATMENT OFFICER VEST	1						
		EARMARK - LOUD MOUTHS	4						
CABINET - F									
	F	COMMAND BOARD	1						
DESK TOP									
	DESK TO	800 Mhz PORTABLE RADIO-MTX 8000	3	STD.					
	DESK TO	800 Mhz PORTABLE RADIO-MTS 2000	1	STD.					
	DESK TO	CELLAR PHONE	1	STD.					
	DESK TO	800 Mhz 6 BANK CHARGER UNIT	1	STD.					

[illegible]

CHECK LIST OF EQUIPMENT ON HAZMAT VEHICLE

Location	Area	Item	Qty.	Size	Check	D & T	By	No. of Items Removed	Date and Nature of Actions Taken
	DRUM	ROLL OF PVC PLASTIC	1						
	DRUM	SOLVEX (NITRILE) GLOVES	12 pr.	STD.					
	DRUM	SLIP-ON SHOE COVERS	12 pr.	STD.					
	DRUM	SPONGES	2						
	DRUM	TIDE SOAP	1 box	STD.					
	DRUM								
	DRUM								
	G	HIGH PRESS. SURVIVAIR SCBA	2	60 mins.					
	G	WALKER	1	STD.					
CABINET-H	H	ROPE BAG - LIFE LINE (BLUE)	2	150'					
	H	ROPE BAG - SAFETY LINE(ORANGE)	2	150'					
	H	ROPE BAG - LIFE LINE (BLUE)	1	300'					
	H	ROPE BAG - SAFETY LINE(ORANGE)	1	300'					
	H	SKED STRETCHER	1	STD.					
	H	ROOF ROLLERS WITH CARABINER	2	STD.					
	H	SURVIVAIR SIGMA HIP PAC'S	2	10 MIN.					
	H	HOISTING SLING	1	2'					
	H	HOISTING SLING	1	6'					
	H	HOISTING SLING	1	8'					
	H	HOISTING LOOP	1	2'					
	H	RAPPELING EQUIPMENT BAG	2	STD.					
	EQ. BAG	CMC RESCUE HARNESSES	1 ea.	M, L, XL					
	EQ. BAG	ROPE EDGE GUARDS	2	2'					
	EQ. BAG	PICK OFF STRAPS - 5', 7' & 10'	1 ea.	5000#					
	EQ. BAG	PRISSIK HITCHES	1	SM.					
	EQ. BAG	PRISSIK HITCHES	2	MED.					
	EQ. BAG	PRISSIK HITCHES	2	LG.					
	EQ. BAG	CARABINER WITH 5 SINGLE PULLEY	1	STD.					

CHECK LIST OF EQUIPMENT ON HAZMAT VEHICLE

Location	Area	Item	Qty.	Size	Check	D & T	By	No. of Items Removed	Date and Nature of Actions Taken
CABINET - I	EQ. BAG	CARABINER & D-PULLEY, 2WAY PULLEY	1 ea.	STD.					
	EQ. BAG	CARABINERS (BLACK)	5	STD.					
	EQ. BAG	ANCHOR PLATES & 6 CARABINERS	1 ea.	STD.					
	EQ. BAG	BRAKER BAR RACKS & CARABINER	3	STD.					
CABINET - J	I	LEVEL "A" - DISP. GAS TIGHT SUIT	2	XL					
	I	LEVEL "A" - DISP. FLASH SUIT	2	XL					
	I	LEVEL "A" - DISP. GAS TIGHT SUIT	2	XXL					
	I	LEVEL "A" - DISP. FLASH SUIT	2	XXL					
CABINET - J	J-1-A	SURVIVAIR FULL FACE MASKS	8	STD.					
	J-1-B	SURVIVAIR ORGANIC CANISTERS	16	STD.					
	J-1-C	SURVIVAIR HALF FACE MASKS	3	LG.					
	J-1-C	SURVIVAIR HALF FACE MASKS	4	MED.					
	J-1-C	SURVIVAIR HALF FACE MASKS	3	SM.					
	J-2-A	NEOPRENE GLOVES	18 pr.	LG.					
	J-2-B	CUTTING GLOVES	1 pr.	LG.					
	J-2-B	LEATHER GLOVES	4 pr.	LG.					
	J-2-B	SILVER SHIELD GLOVES	6 pr.	LG.					
	J-2-C	VITON GLOVES	12 pr.	STD.					
	J-3-A	MONOGOGGLES	8 pr.	STD.					
	J-3-B	WILSON SAFETY GLASSES	12 pr.	STD.					
	J-3-C	THROW-AWAY SPLASH SHIELDS	2	STD.					
	J-3-C	THERMAL SEAL CLEAR INSERTS	2	STD.					
	J-3-C	FACE SHIELDS FOR HARDHATS	8	STD.					
	J-4-A	RED & YELLOW BANNER TAPE	1 ea.	STD.					
	J-4-B	PAIL OPERNER	1	STD.					
	J-4-B	BAG OF SEAL FLEX	1	STD.					
	J-4-B	RED FLAGS	8	SM.					

CHECK LIST OF EQUIPMENT ON HAZMAT VEHICLE

Location	Area	Item	Qty.	Size	Check	D & T	By	No. of Items Removed	Date and Nature of Actions Taken
CABINET-M	M	TINGLEY (PVC / NITRILE) BOOTS	2 pr.	8's					
	M	TINGLEY (PVC / NITRILE) BOOTS	2 pr.	9's					
	M	TINGLEY (PVC / NITRILE) BOOTS	2 pr.	10's					
	M	TINGLEY (PVC / NITRILE) BOOTS	2 pr.	11's					
	M	TINGLEY (PVC / NITRILE) BOOTS	2 pr.	12's					
	M	TINGLEY (PVC / NITRILE) BOOTS	2 pr.	13's					
CABINET-N									
	N	IGLOO DRINKING COOLER / CUPS	1	5 GAL.					
	N	GATOR AID DRINK	1	CAN					
	N	BAG OF ASSORTED WEDGES	1	STD.					
	N	GARBAGE BAGS	1	BOX					
	N	GARDEN SPRAYER	1	2 GAL.					
	N	CHEMICAL SPLASH HOODS	2	STD.					
CABINET-O	O	SPILL CONTROL KIT DRUM	1	85 gal.					
	DRUM	3M ABSORBANT BOOMS	4	8'					
	DRUM	3M ABSORBANT BOOMS	4	12'					
	DRUM	3M ABSORBANT CHOPPED	4	bag					
	DRUM	3M ABSORBANT PADS	50	24" x 24"					
	DRUM	3M ABSORBANT PILLOWS	16	6" X 18"					
	O	HIGH PRESS. SURVIVAIR SCBA	2	60 mins.					
	O	AIR LINE SUPPLY HOSE	6	50'					
	O	WALKER	1	STD.					
CABINET-P ROLL-UP LEFT SIDE	TOP	DRUM REPAIR KIT	1	STD.					
	BOX	DRUM REPAIR - BALL PLUGS	1	1 1/8"					
	BOX	DRUM REPAIR - BALL PLUGS	1	2"					
	BOX	DRUM REPAIR - CHANNEL LOCKS	1	STD.					
	BOX	DRUM REPAIR - CRESCENT	1	10"					

Location	Area	Item	Qty.	Size	Check	D & T	By	No. of Items Removed	Date and Nature of Actions Taken
	BOX	DRUM REPAIR - CRESCENT	1	12"					
	BOX	DRUM REPAIR - DOWELS/WEDGES	1 set						
	BOX	DRUM REPAIR - EPOXY PUTTY	1						
	BOX	DRUM REPAIR - FLAT PLUG	1	1 1/2"					
	BOX	DRUM REPAIR - FLAT PLUG	1	1 1/4"					
	BOX	DRUM REPAIR - FLAT PLUG	1	1"					
	BOX	DRUM REPAIR - FLAT PLUG	1	2 1/2"					
	BOX	DRUM REPAIR - FLAT PLUG	1	2"					
	BOX	DRUM REPAIR - FLAT PLUG	1	3"					
	BOX	DRUM REPAIR - GROUND CLAMP	1	36"					
	BOX	DRUM REPAIR - KNIFE	1	4"					
	BOX	DRUM REPAIR - MINI-STOPPERS	4	TAPERED					
	BOX	DRUM REPAIR - PLIERS	1	6"					
	BOX	DRUM REPAIR - RADIATOR CLAMP	8	VAR.					
	BOX	DRUM REPAIR - DUCT TAPE	1	2"					
	BOX	DRUM REPAIR - ELECT. TAPE	1	3/4"					
	BOX	DRUM REPAIR - NEOPRENE ROLL	1	4" x 12"					
	BOX	DRUM REPAIR - RUBBER Mallet	1	2 #					
	BOX	DRUM REPAIR - SCREWDRIVER	1	4"					
	BOX	DRUM REPAIR - SCREWDRIVER	1	6"					
	BOX	DRUM REPAIR - METAL SCREWS	2	1"					
	BOX	DRUM REPAIR - METAL SCREWS	3	1 1/4"					
	BOX	DRUM REPAIR - T-BOLT PATCHES	1	1" x 3"					
	BOX	DRUM REPAIR - T-BOLT PATCHES	1	3" x 3"					
	BOX	DRUM REPAIR - GOLF TEES	6	1 1/2"					
	TOP	AIRLINE DELIVERY SYSTEM BOX	1	4 outlet					
	TOP	ROLL OF VISQUEEN PLASTIC	1	12' x 100'					
CABINET- P	TOP	PORTABLE FLOOD LIGHTS	2	500 watts					
ROLL-UP	TOP	AIRLINE-WORKUNIT to AIR BOX	1	20'					
LEFT SIDE	TOP	PIPE PATCH KIT	1	STD.					
continued	BOX	PIPE PATCH - COMB. WRENCH	1	1 1/16"					
	BOX	PIPR PATCH - COMB. WRENCH	1	3/4"					
	BOX	PIPE PATCH - DEEP SOCKET	1	1 1/16"					
	BOX	PIPE PATCH - DEEP SOCKET	1	3/4"					
	BOX	PIPE PATCH - GAS LINE CLAMP	1	LG.					
	BOX	PIPE PATCH - PIPE CLAMP	1	1 1/2"					
	BOX	PIPE PATCH - PIPE CLAMP	1	1 1/4"					

CHECK LIST OF EQUIPMENT ON HAZMAT VEHICLE

Location	Area	Item	Qty.	Size	Check	D & T	By	No. of Items Removed	Date and Nature of Actions Taken
	BOX	PIPE PATCH - PIPE CLAMP	1	1"					
	BOX	PIPE PATCH - PIPE CLAMP	1	1 1/2"					
	BOX	PIPE PATCH - PIPE CLAMP	1	2 1/2"					
	BOX	PIPE PATCH - PIPE CLAMP	1	3 1/2"					
	BOX	PIPE PATCH - PIPE CLAMP	1	3"					
	BOX	PIPE PATCH - PIPE CLAMP	1	3/4"					
	BOX	PIPE PATCH - PIPE CLAMP	1	4"					
	BOX	PIPE PATCH - PIPE CLAMP	1	5"					
	BOX	PIPE PATCH - SOCKET EXTENSION	1	6"					
	BOX	PIPE PATCH - SOCKET WRENCH	1	3/8"					
	BOTTOM	CHLORINE "B" KIT (TANK CAR)	1	T/C					
	BOTTOM	CHLORINE "C" KIT (TON CYLINDER)	1	1 ton					
	BOTTOM	SALVAGE DRUM LIFTER - 3' SLING	1	85 gal.					
	BOTTOM	LARGE T/T DOME CLAMP	1	12" to 23"					
	BOTTOM	SMALL T/T DOME CLAMPS	set of 3						
	BOTTOM	SPILL STOPPER (DRAIN COVERS)	2	24" x 24"					
	BOTTOM	AIRLINE QUICK CONNECT PIGTAIL	1	12'					
	BOTTOM	DRUM TOURNIQUET	1	55 gal.					
CABINET-Q ROLL-UP RIGHT SIDE	TOP	220 volt ELECT. POWER SUPPLY	1	10'					
	TOP	ELECTRICAL EXTENSION CORD	1	50'					
	TOP	PIGTAIL (EXPLOSION x REGULAR)	1	2'					
	BOTTOM	HONDA ELECT. GENERATOR	1	20/240 v.					
	BOTTOM	GASOLINE CAN	1	1 gal.					

[illegible]

Spill Response Equipment

1000 feet of containment boom as well as various sizes of inflatable pipe plugs up to 72" diameter are available for immediate deployment by Lubrizol's Emergency Response Organization.

Spill containment equipment is stored on the HazMat vehicle that is centrally located within our plant. The containment boom and inflatable plugs are securely stored nearby for use if required. Lubrizol-Painesville does not have any Chemical Countermeasure Agents (dispersants) as described in the NCP product schedule.

Various absorbents and sand are available to mitigate spills. These are stored on the emergency hazardous materials vehicles, the fire trucks, and throughout the plant inside spill-kits.

The fire fighting and personnel protective equipment as listed in the attached equipment list is kept on the HazMat vehicle and fire trucks. In addition, each emergency responder has his or her own personal fire fighting bunker gear.

Other fire equipment is located in our on-site fire station and storage building. Also, there are fire hydrants, fire hose reels and fire hose houses located throughout the facility. Self-contained breathing apparatus' (SCBA's) are located in buildings throughout the facility as well.

Release Handling Capabilities and Limitations

The HazMat vehicle and associated spill containment equipment are capable of handling most small releases and limiting movement or containing medium sized releases. Medium to large size releases generally would require assistance from outside agencies.

1.3.3 Response Equipment Testing and Deployment Log

1.3.3 Response Equipment Testing/Deployment

As noted in section 1.8: Self-Inspection, Drills/Exercises, and Response Training, all equipment is tested in accordance with manufacturer's recommendations. If, during an incident, equipment requiring testing is used, testing and appropriate documentation is completed when post incident inspection and/or inventory takes place.

- Date of last inspection or equipment test: The emergency vehicles and corresponding equipment are checked regularly. More specifically, the spill response equipment (sewer plugs, inflatable plugs, and river/lake booms) were last inspected and tested as part of Emergency Response Organization (ERO) annual training (October 2009).
- Inspection frequency: The emergency vehicles and corresponding equipment are checked on a regular basis.
- Date of last deployment: The spill response equipment was last inspected and tested as part of our Emergency Response Organization (ERO) annual training (October 2009).
- Deployment frequency: As needed, but at a minimum, emergency response equipment is utilized during the ERO training sessions 6 times per year and at least once per calendar quarter.
- OSRO Certification: See Appendix II for selected OSRO certifications.

1.3.4 Response Personnel

1.3.4 Response Personnel

Emergency Response Personnel List

See ERO Organization Personnel List (Tab 15) in the Lubrizol-Painesville Emergency Response Manual (Appendix I) for a diagram illustrating how the Emergency Response Organization (ERO) is organized and listing officers and their respective phone numbers. The remainder of the shift emergency responders, seventeen (17) minimum on each of four (4) shifts, are not listed due to regular movement from shift to shift. Any documentation would quickly be outdated.

Response Time:

Emergency responders, including officers, are available immediately, 24 hours per day, 365 days per year. Patrick Shannon, the Emergency Response Supervisor, has a response time of 25 minutes during off-hours.

Responsibilities:

Each ERO responder's responsibility is to respond to an alarm and/or spill immediately. They are then trained to keep an emergency under control and mitigate any problems through the use of spill containment practices and/or fire-fighting techniques.

Type and date of response training:

Emergency Response (ERO) personnel receive extensive training annually. ERO training sessions are 6 times per year and at least once per calendar quarter.

In summary, ERO personnel receive the following training:

- Firefighting - 36 hour basic course
- First responder awareness
- First responder operational
- Hazardous materials technician

In addition, ERO officers receive incident command, hazardous materials incident command and courses dealing with the media.

Emergency Response Contractors

Lubrizol uses the following contractors as needed, to assist in spill clean-up/response. References to Oil Spill Response Organizations (OSRO) in this plan indicate either of these companies:

Inland Waters of Ohio

2195 Drydock Avenue
Cleveland, Ohio 44113
216-861-3949

24-hour emergency number: 800- 869-3949

Response time is approximately one to two hours to Lubrizol-Painesville.

Chemtron Corporation

35850 Schneider Court
Avon, OH 44011
440-933-6348

24-hour emergency number: 440-937-5950

Response time is approximately one to two hours to Lubrizol-Painesville.

Evidence of Response Capability and contractual agreements:

The capabilities of OSRO and contractual agreements are detailed in "OPA '90 Resources" (Appendix II). OSRO can respond to our facility's needs generally within one (1) to two (2) hours.

Facility Response Team List

In Tabs 5 & 6 of Lubrizol-Painesville's Emergency Response Manual (Appendix I) is an illustration of the ERO organizational structure for each of the four- (4) shifts.

Response time:

Response to an emergency by way of an emergency alarm and/or radio communication, such as an oil release, is immediate because the plant is always in operation.

1.3.5 Evacuation Plans

Facility-Wide Evacuation Plan

When evaluating a need for evacuation all of the following factors are considered:

- Location of stored materials – An evaluation is made as to the risk of exposure in the event of a spill. Each designated evacuation assembly point is located such that it is a safe distance away from any stored hazardous materials. Factors such as wind speed and direction will be used to determine the best mustering point.
- Hazard imposed by spilled material – Each raw material and product in the facility has a Material Safety Data Sheet (MSDS). This information, along with product knowledge, experience, and training is used to safely evaluate the situation and safely evacuate any personnel that may be impacted.
- Spill flow direction – Spill flow direction is determined immediately. This is used to anticipate where the material will flow such that the appropriate evacuation assembly point can be used. Also, see section 1.9, Diagram 3.
- Prevailing wind direction and speed – Instrumentation and windsocks are located throughout the facility as well as off site to determine wind speed and direction. This critical information and is used to determine evacuation routes.
- Water currents, tides, or wave conditions (if applicable) – Not-applicable.
- Arrival route of emergency response personnel and response equipment - Instrumentation and windsocks are located throughout the facility as well as off site to determine wind speed and direction. These are used to designate a safe arrival route.
- Evacuation routes – Evacuation assembly points can be found on an illustration in Lubrizol-Painesville's Emergency Response Plan (Appendix I) under Tab 10. Safe routes to the assembly points via plant roadways will be determined by the incident commander.
- Alternative routes of evacuation – All of the above considerations are considered in determining which of the (3) evacuation assembly points and routes will be used.
- Transportation of injured - Any injured personnel would be transported via Lubrizol-Painesville's rescue squad. Employee drivers are certified EMT's and/or paramedics and those injured

would be brought to the local hospital, Tripoint Medical Center. The rescue squad has radio and phone contact with the hospital while en route.

- Locations of alarm/notification systems – There are numerous pull alarms throughout the facility, both inside and outside of buildings. Alarms are all tied into the central security office where an automated notification over a PA system is given as to the exact location of an emergency. In addition, hand-held radios and telephones can be used.
- Centralized check-in area for roll call – A designated supervisor from all departments will make a roll call at the evacuation assembly points used.
- Mitigation command center location – An appropriate staging area will be organized at the scene of an emergency. Also, depending on the incident, an emergency control center is set up to aid in the management of the incident. See Lubrizol-Painesville's Emergency Response Plan (Appendix I), Tab 13 for details.
- Location of shelter at facility – Shelter-in-Place locations can be found on an illustration in Lubrizol-Painesville's Emergency Response Plan (Appendix I) under Tab 10.

Community Evacuation Plans

The Incident Commander will determine if the incident may or will affect the community (level 2 or 3 emergency, respectively) and determine if the Painesville Township Fire Department should be notified and placed on stand-by or to respond to the emergency and if it is necessary to activate the County M.A.B.A.S. to respond. See Lubrizol-Painesville's Emergency Response Plan (Appendix I), Tab 4 for details.

1.3.6 Qualified Individual's Duties

1.3.6 Description of Qualified Individual's Duties

The qualified individual in the event of an emergency will perform the following duties:

- Immediately respond to an activated internal plant alarm. This in turn directs the emergency responders to the exact location.
- Identify the character, exact source, amount, and extent of the release by information gathered from personal knowledge, engineers and operators, and material safety data sheets (MSDS).
- Notify if necessary all Federal, State and local authorities of the needed information.
- Assess the interaction of the spilled substance with water and/or other substances and notify the response personnel of assessment results. The determination will be made by information gathered from personal knowledge, engineers and operators, and material safety data sheets (MSDS).
- Assess the possible hazards to human health and the environment due to the release.
- Contain and remove the substance immediately.
- Acts as incident commander to coordinate rescue and response actions at the scene.
- Authorize the release of funding to initiate cleanup.
- Stay at scene to direct cleanup activities until completed or is properly relieved of responsibilities.

The following pages have been copied from Lubrizol-Painesville's RCRA Contingency Plan. These support the above information. Although the RCRA Contingency Plan has been written specifically to address a release of hazardous waste, the same procedures are followed for the release of any oil or chemical.

G-2 EMERGENCY COORDINATORS

OAC 3745-54-52(D), 3745-54-55

The Painesville Plant operates continuously throughout the year. During facility operation, the "Emergency Coordinator" responsible for environmental problems will be the Emergency Response Coordinator. During his absence and on nights and weekends the Environmental, Health and Safety (EH&S) Coordinator will act as the Emergency Coordinator. The exact EH&S Coordinator available will depend on the shift operating at the time of an emergency. This person or designate will be on site when the facility is operating. If the entire facility is shut down, a skeleton "fire watch" crew will oversee the facility and will notify any of the EH&S Coordinators at home if an emergency develops. The facility operates with four shifts. These shifts are designated "A", "B", "C", and "D". The name, home address and home telephone number for each member of the supervisory fire/rescue staff assigned to each of the four shifts is provided in Exhibit G-6. Each of the individuals listed is authorized to act as an Emergency Coordinator. The Emergency Coordinator is familiar with all aspects of the plan and all operations and activities at the facility. Each is qualified to coordinate all required emergency response measures, and has the authority to commit the resources needed to carry out this contingency plan.

If circumstances arise whereby the EH&S Coordinator is unable to fulfill his duties, his responsibilities are transferred first to the Shift Assistant Chief, then to the Shift Captains, and finally to the Shift Lieutenants. All shift personnel carry radios while on duty. Selected support staff (i.e. Environmental, Health and Safety, and Operations management) carry personal pagers, radios and/or cellular phones which can be used to obtain technical and managerial support in the event of an emergency.

The Emergency Coordinator will determine the necessary action to be taken based on the type of emergency. Section G-3 details criteria that the Emergency Coordinator will utilize to determine if the Contingency Plan will be implemented. Procedures outlined within the Contingency Plan, including those contained within the Emergency Response Plan, will be utilized by the Emergency Coordinator at the time of the emergency.

G-3 IMPLEMENTATION

OAC 3745-54-52(A), 3745-54-51

The Contingency Plan provides criteria for action to be taken in the event of a fire and/or explosion, natural disaster, or release of hazardous waste or hazardous waste constituents which threatens or could threaten human health or the environment. The Contingency Plan will be implemented in the event of any one or combination of the following:

- Unexpected sudden or non-sudden release of hazardous waste.

- Fire involving hazardous waste.
- Explosion involving hazardous waste.
- Other situations, as determined by the EHS&S Coordinator , which involve hazardous waste.

Events described above may be triggered by:

- Equipment failure
- Heavy rainfall that produces significant facility flooding
- Other natural disasters (i.e., tornado, earthquake, etc.)

The response to emergencies involving hazardous waste is identical regardless of the cause of the incident.

Implementation of the Contingency Plan will mitigate or protect facility and neighboring personnel from injury; contamination of storm sewers with hazardous materials; damage to equipment; damage to the environment; or a combination of these events. The Contingency Plan is a subset of Lubrizol Painesville's Emergency Response Plan. The Emergency Response Plan provides general guidelines for actions to be taken in the event of an emergency at the plant. The Emergency Response Plan is presented in part, in Exhibit G-7. The Contingency Plan will not be implemented for minor spills or fires which are readily mitigated.

The exact implementation steps will vary depending upon the area where the emergency occurs and the nature of the emergency.

G-4 EMERGENCY RESPONSE PROCEDURES

G-4a Notification

OAC 3745-54-56(A) & (D)

Whenever there is an imminent or actual emergency situation, the Emergency Coordinator (or his designee when the Emergency Coordinator is on call) will immediately activate internal facility alarms or communication systems, where applicable, to notify all facility personnel. The specific procedures employed at the facility to notify facility personnel of an imminent or actual emergency situation are discussed in detail in Exhibits G-7.

When an emergency situation develops at the facility that is beyond the capabilities of the facility's on-site Emergency Response Organization, appropriate state and local authorities are notified.

If the Emergency Coordinator determines that the facility has had a release, fire, or explosion which could threaten human health or the environment outside the facility,

he, or his designate, will immediately notify the Environmental Assurance Engineer/Technologist. Qualified Lubrizol personnel, including but not limited to environmental assurance engineer or emergency coordinator, will immediately notify:

- U.S. Coast Guard National Response Center
- Ohio EPA
- Painesville Township Fire Department
- Local Emergency Planning Committee
- Lake County Health Department (if necessary)
- Central Dispatch (if necessary)

When the qualified Lubrizol personnel contacts these agencies, he will provide his name and telephone number plus the available information of the emergency events. An example of a reporting form for emergency events shown in Exhibit G-1. Exhibit G-4 is the list of emergency numbers that is maintained and kept current in the security office.

If the Contingency Plan is implemented, prior to resuming operations in the affected area, the Ohio EPA and appropriate local authorities will be notified that:

- No waste that may be incompatible with the released material is treated, stored, or disposed of until cleanup procedures are completed
- All emergency equipment listed in the Contingency Plan is cleaned and fit for its intended use.

Within fifteen (15) days of an incident requiring implementation of the Contingency Plan, a written report will be submitted to the Ohio EPA director. The written report will contain the name, telephone number, and address of Lubrizol as well as the date, time, type of incident, name and quantity of materials involved, extent of injuries, an assessment of actual or potential hazards to human health or the environment, and the estimated quantity, planned disposal method, and description of the recovered material that resulted from the incident.

G-4b Identification of Hazardous Materials

OAC 3745-54-56 (B)

If a release of hazardous waste occurs as the result of an emergency situation, the Emergency Coordinator will immediately identify the release as follows:

1. Nature of release
2. Exact source of the release
3. Aerial extent of the release
4. Chemical characteristics of the material release
5. Total amount of release
6. Whether the release is a hazardous material. This identification will be done by a combination of:
 - a. Observation of source and appearance of release
 - b. Review of plant operating records
 - c. Chemical or physical analysis
 - d. Review of plant hazardous material files

Information related to the above can be found in the facility's waste tracking logs, analytical records or material safety data sheets. Any emergency involving the incinerator, the permitted slurry management tanks (W-1, W-6, W-7), phase separation tank (W-34), or the storage tanks (W-11, W-12, W-13, W-14, W-15, W-31, W-32, or W-33) or the <90 day generator storage tanks (E-75, J-15, 31, 102 or 130 tanks) or <90 day container (central waste) storage area, QA container storage area or the roll-off storage area will be an emergency involving hazardous wastes.

The Emergency Coordinator will immediately notify the appropriate members of the Emergency Response Organization of the results of this identification so that they can take proper precautions during their emergency response work. Other authorities shall also be notified by qualified Lubrizol personnel as required by either the plant contingency plans or governmental regulations.

This information along with the use of the MSDS's, product knowledge and experience is used to make the following assessments:

- Any interaction of the spilled substance with water and/or any other substances and then pass this along to all on-scene personnel.
- Any possible hazards to human health and the environment.

- The prompt removal actions of the substance(s).

The on-scene EHS Coordinator has the responsibility and capability to coordinate rescue and response actions and access the company funding to initiate cleanup activities and direct the cleanup activities.

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1.4 HAZARD EVALUATION

1.4.1 Hazard Identification

1.4.2 Vulnerability Analysis

1.4.3 Analysis of Potential for a Spill

1.4.4 Spill History

1.4 HAZARD EVALUATION

1.4.1 Hazard Identification

Diagram 1 in Section 1.9 Diagrams shows the location and tank number of all storage tanks within the facility. The facility has no underground storage tanks or impoundments as indicated on the schematic.

Tank Form

The facility maintains an electronic inventory of all bulk storage tanks that list the capacity and current contents. This can be found on the Painesville intranet at:

N:\Operations\Painesville\OPRData\Environmental\Environmental & Technical\SPCC\04SPCCdata(Main Copy).xls

An *example* of this table has been provided for reference in Attachment 11 of the SPCC plan, (Appendix III) (Note: the electronic version always supersedes the version presented in this Plan). Procedures for changing storage tank service are documented in work instruction Q.S. No. 03-4.15-300-1021. Procedures call for electronic notification of appropriate personnel for changes in tank service to include tank number, contents, the new safe tops calculation and NFPA H-F-R code for labeling the tank.

Additionally, tank inventory logs with contents and current inventory are maintained by the operators in each area and are filled out twice daily. These can be found on the Painesville intranet at:

N:\Operations\Painesville\OPRData\PVReference\Night Sheets

There have been no failures of any tanks that resulted in the loss of tank contents. Lubrizol does not normally fill tanks over 90% of capacity, or "safe tops", to reduce overfill of storage tanks. There is a procedure (QMS-03-4.9-361-2056) to be followed if there is a need to temporarily exceed safe tops.

Surface Impoundment Form

There are no surface impoundments at the facility.

Facility Operations Description

Loading & Unloading Procedures:

The SPCC Plan (Appendix III) references procedures for loading and unloading materials in Section II, Regulatory Cross-Reference, 112.7(a)(3)(ii).

Day to Day Operations:

The Lubrizol-Painesville facility manufactures specialty additive systems for lubricating oils used in gasoline and diesel engines, automatic transmissions, gear drives, marine engines and tractors; As well as specialty products for industrial fluids, fuel additives, process chemicals, coating additives and metal working fluids. Raw materials are brought into the plant daily by rail, tank truck and drum for use in production of the additives. The raw materials are unloaded into the appropriate storage tank to be used at a later date or used directly from the shipping container in the production area. Intermediates and finished additives are shipped daily from Painesville in rail cars, tank trucks and drums and totes.

Secondary Containment:

See Attachment III from the SPCC Plan (Appendix III).

Daily Throughput:

278.0 MT

1.4.2 Hazard Evaluation

As stated in the worst case discharge scenario (section 1.5.2), any spilled material from the tank would be contained within the secondary containment dike. All the storage tanks in the tank farms are contained within a secondary containment and are located within the boundaries of the facility's storm water drainage system. Thus, if a breach would occur in the secondary containment dike, the storm water drainage system would still be available to retain spilled material on site. The storm sewer system has the capability to pump back to the process treatment system where there are (2) wastewater storage tanks capable of holding 750,000 gallons of material each.

In the unlikely event any spilled material was released to Blackbrook Creek, Lubrizol's Emergency Response Organization (ERO) would immediately deploy absorbent and containment booms and inflatable plugs inside culverts to stop flow at strategic points along Blackbrook Creek. There is a 54" slide gate valve located at the point where the creek exits the plant that can be closed to prevent material from leaving the property. In addition, there are gate valves located throughout the property along the stormwater and process sewer systems and the creek

to stop and isolate flow. Lubrizol's worst-case discharge OSRO would be contacted promptly to initiate response. As indicated in the OSRO documentation (Appendix II), the selected OSRO has the capability to contain and remove the spilled material.

There are no water intakes that exist along Blackbrook Creek. In addition, there are no schools, medical facilities, businesses, recreational areas, transportation routes or utilities that exist along Blackbrook Creek. Therefore there would be no impact on any of these. There is no endangered flora and fauna, and minimal fish and wildlife present in or along the creek on the Lubrizol property.

Located approximately a mile downstream and outside our property, a small portion of the creek meanders on the outskirts of the property of a small condominium complex. In the event of a spill into the creek, it is highly unlikely that this area would be impacted due to its distance downstream and the immediate response of Lubrizol's ERO team, as stated above, and the capability to isolate any potential spills on site.

Blackbrook Creek on our property has a low flow velocity most of the year, but it can increase to moderate or high flow during large rainfall events. The planning distance calculations were based on worst case discharge of persistent oils during adverse weather conditions. Using the calculations in Appendix C to Part 112, Attachment C-III, the planning distance was determined to be 34 miles. It can reasonably be assumed that any release from the facility would be constrained by the Mentor Marsh, a 673-acre state nature preserve, which is approximately two miles downstream from the facility.

The Mentor Marsh, in turn, discharges into Lake Erie. Lubrizol is very aware of the impact a discharge could potentially have on this wetland area, fish, wildlife, flora, fauna and the lake. There are no other streams or lakes that would be impacted. Again, it is highly unlikely that any potential spill would ever make it this far down stream due to isolation capabilities on site and the immediate response of the emergency response organization. The employees of Lubrizol-Painesville take movement and storage of materials throughout the facility very seriously. Personnel understand that there is the potential to impact the environment directly.

Please see section 1.9 Maps, Site Drainage Plan indicating the path of Blackbrook Creek and the distance to the sensitive area, the Mentor Marsh. Also, see section 1.9, Diagram 3 for detail on the drainage patterns within the facility.

As noted in the Emergency Response Notification section of this plan, the Emergency Response Organization (ERO) is available to respond to spills, fires and rescues immediately.

In addition, all notifications will be made to all the required agencies as outlined in the section 1.3.1 Notification. This would include but not limited to the Trustees of the Mentor Marsh Board of Management, the National Response Center (NRC), Ohio EPA, Painesville Township Fire Department, LEPC, and the OSRO if needed.

1.4.3 Analysis of Potential for a Spill

The developed areas of the facility have both process and storm sewer systems. Any spill which occurs within this area can be contained within these systems. The process sewer system has the capability to segregate and contain/hold up to 1.4 million gallons of material in two surge tanks. The storm sewer system has the capability to retain in excess of one million gallons of material by closing strategically placed valves, before discharging into Blackbrook Creek.

All tank farms are diked to provide containment of material if a tank failure should occur. Thus, the horizontal range of a spill is limited to the general area of the tank by these earthen dikes. Tank farm dike areas can only be drained to the process sewer system. Valves to the storm sewer do not exist. For a material to reach the storm sewer system during a tank failure, the dike would have to fail.

Releases from storage tanks are not expected to be a result of tank age since materials are checked for compatibility with tank material of construction before storage takes place. Any corrosion noted on the outside of the tanks is repaired as necessary. In fact, since product turnover is quite regular, tanks are regularly emptied, cleaned and inspected internally prior to switching stored materials. As a result of this work, since 1973 Lubrizol-Painesville has had no reportable discharges related to tank failure.

The facility is not expected to have a release as a result of a natural disaster. The facility is not located in a political jurisdiction related to seismic concerns as listed in 40 CFR Part 264 Appendix VI. As determined using a U. S. Federal Insurance Administration flood plan map, the facility is outside the 100-year flood plan.

1.4.4 Spill History

From January 1973 through October 2009 Lubrizol has had two reportable oil releases. For each instance, the written notification form sent to the Agency is attached for reference. The releases have been

summarized below to ensure the requirements of the rules have been met.

On January 14, 1992, approximately 7,500 gallons of untreated process effluent were discharged to Blackbrook Creek. Lubrizol was not able to determine how much, if any, of the process waters discharged reached the navigable waters of Mentor Marsh and/or Lake Erie. It was determined that the discharge occurred due to high levels in the effluent pretreatment system resulting from heavy rains. Effluent flowed out of the lowest point in the system directly to the storm water drainage system. Immediately after detection, a valve was closed downstream to stop material from continuing to enter Blackbrook Creek. All waters contained behind the valve were pumped to the Painesville City Wastewater Treatment Plant, after approval was obtained, via the sanitary sewer system. No clean up was necessary downstream of the valve due to the very low constituent level in the waters discharged. To reduce the possibility of recurrence, the operation of the pretreatment system was reviewed and modified to keep the system level to a minimum.

The discharge was detected within the plant by one of the operations group personnel. Because it was raining at the time, the flow control located at the discharge of the storm water collection basin did not indicate an increase in flow rate. The pH monitoring system likewise did not indicate a problem existed, for the discharge was neutral. No enforcement actions resulted from the incident.

On July 14, 1992, approximately ten (10) pounds of oil may have been released into Blackbrook Creek. Lubrizol was not able to determine how much, if any, oil reached the navigable waters of the Mentor Marsh and/or Lake Erie. The discharge occurred due to heavy rains, which caused the storm water retention basin to overflow. All material that overflowed was contained behind a downstream storm water retention valve. A breach in the dike wall upstream of the retention valve was noted. Due to continued rains, it became necessary to release some of the water contained behind the valve to prevent flooding and a possible uncontrolled release. A filter fence was built on the discharge side of the valve (per Ohio EPA suggestion) and water was discharged through the booms to Blackbrook Creek without a noticeable oil sheen.

The discharge was detected by the effluent operations operator. To reduce the possibility of recurrence, Lubrizol made improvements to the oil skimmer collection system. Equipment was installed to more effectively collect trace oil which enters the basin from the active area of the facility. During heavy rains, the monitoring system consists of continual supervision of the storm water retention basin by process effluent operator. No enforcement actions resulted from the incident.



LUBRIZOL PETROLEUM CHEMICALS COMPANY
155 FREEDOM ROAD
P.O. BOX 428
PAINESVILLE, OHIO 44077-1234
TELEPHONE: (216) 943-4200

February 13, 1992

Certified Mail
Return Receipt Requested

Mr. Kenneth A. Schultz
Ohio Environmental Protection Agency
Division of Emergency and Remedial Response
P.O. Box 1049
1800 WaterMark Drive
Columbus, Ohio 43266-0149

Dear Mr. Schultz:

The Lubrizol Corporation ("Lubrizol") is following up its verbal notification (ID #9201-43-0165) of a discharge of a combination of storm water and process effluent which occurred on January 14, 1992.

Although Lubrizol does not believe the discharge resulted in exposure to any persons, nevertheless, the following information is provided in response to questions delineated under Ohio Revised Code section 3750.06 (D):

1. *Location of the release.*

The release occurred at Lubrizol's Painesville Plant located at
155 Freedom Road
Painesville, Ohio 44077

2. *The chemical name or identity of any substance involved in the release and whether the substance is an extremely hazardous substance.*

The substance involved in the discharge was a mixture of untreated process effluent and storm water. Although specific composition/characteristics of the material discharged are uncertain, analyses of the material retained behind the in-plant retention valve were as follows:

pH	6.9
COD	131 ppm
Zinc	96 ppb
Benzene	0.6 ppb
Toluene	2.9 ppb
Ethyl Benzene	21.4 ppb
No oil sheen	

3. *An estimate of the quantity of any substance released into the environment.*

Approximately seventy five hundred gallons of process effluent were discharged.

4. *The time and duration of the release.*

The release started at approximately 9:00 am on January 14, 1992, and lasted for approximately 45-75 minutes.

Mr. Kenneth A. Schultz
February 12, 1992
Page 3

11. *Where appropriate, advice regarding medical attention necessary for individuals exposed to the substance released.*

No known exposure of off-site personnel.

12. *Summary of all actions taken by the owner or operator to prevent a recurrence of the release, any information submitted pursuant to Division (D)(4) of this section is subject to the Evidence Rule 407.*

Immediate action was taken to reduce levels in the sewer system to stop the overflows. In addition, grading was modified to reroute any future overflow of the process effluent into the plant storm water basin. This basin has the capability to pump material back to the plant's effluent pretreatment system.

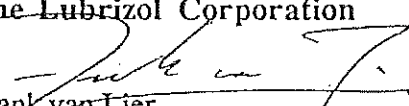
13. *Such other information as is required by rules adopted under Division (B)(1)(f) of Section 3750.02 of the Revised Code.*

No additional information required.

Do not hesitate to contact me at (216) 943-4200 extension 3629 if additional information is required.

Best regards,

The Lubrizol Corporation


Frank van Lier
Environmental Assurance Engineer

cc: Mr. Walter W. White, Painesville City WWTP



LUBRIZOL PETROLEUM CHEMICALS COMPANY
155 FREEDOM ROAD
P.O. BOX 428
PAINESVILLE, OHIO 44077-1234
TELEPHONE: (216) 943-4200

August 12, 1992

Certified Mail
Return Receipt Requested

Mr. Robert Retzler
Information Coordinator
Lake County Area Hazardous Material Advisory Council
P.O. Box 480
Mentor, Ohio 44061

Dear Mr. Retzler:

The Lubrizol Corporation ("Lubrizol") is following up its verbal notification of a possible release of an oil sheen on July 14, 1992.

Lubrizol is providing the following information in response to questions delineated under Ohio Revised Code section 3750.06 (D):

1. *Location of the release.*

The release occurred at Lubrizol's Painesville Plant located at
155 Freedom Road
Painesville, Ohio 44077

2. *The chemical name or identity of any substance involved in the release and whether the substance is an extremely hazardous substance.*

The substance involved in the release was oil from a waste water separation system.

3. *An estimate of the quantity of any substance released into the environment.*

An estimated ten (10) pounds of oil may have been released into the environment.

4. *The time and duration of the release.*

The release started at approximately 11:00 pm on July 13, 1992, was noted at approximately 3:10 a.m. on July 14, 1992, and stopped at approximately 4:00 a.m. on July 14, 1992.

5. *The environmental medium or media into which the substance was released.*

The release was to Blackbrook Creek. No complaints were received from outside the facility. No evacuation of on-site or off-site personnel was deemed necessary.

Mr. Robert Retzler
August 12, 1992
Page 3

11. *Where appropriate, advice regarding medical attention necessary for individuals exposed to the substance released.*

No known exposure of off-site personnel.

12. *Summary of all actions taken by the owner or operator to prevent a recurrence of the release, any information submitted pursuant to Division (D)(4) of this section is subject to the Evidence Rule 407.*

Repairs have been made to the dike wall and improvements have been made so the integrity of the dike can be monitored on a routine basis.

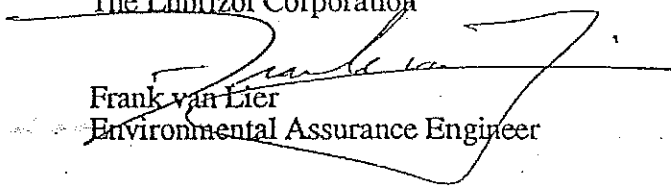
13. *Such other information as is required by rules adopted under Division (B)(1)(f) of Section 3750.02 of the Revised Code.*

No additional information required.

Do not hesitate to contact me at (216) 943-4200 extension 3629 if additional information is required.

Best regards,

The Lubrizol Corporation



Frank van Lier
Environmental Assurance Engineer

ref: National Response Center Report #126547
cc: Mr. Kenneth A. Schultz, Ohio EPA
Mr. Walter White, Superintendent, Painesville City Waste Water Treatment Plant
Chief Armstrong, Painesville Township Fire Department

bcc: CAC, RMS, DJE/GLL/KJK, DLC0/FAD, KHF

1.5

OIL POLLUTION ACT OF 1990
MANUAL

1.5 DISCHARGE SCENARIOS

1.5.1 Small and Medium Volume Discharges

1.5.2 Worst Case Discharge (WCD)

1.5 DISCHARGE SCENARIOS

1.5.1 Small and Medium Volume Discharges

Small Discharge

The most probable discharge is less than 60 gallons due to an overload or gasket failure. Impact of this spill would be minimal considering secondary containment capabilities and available spill response equipment contained within Lubrizol-Painesville's HazMat Vehicle.

In the event a spill from the facility escapes secondary containment and then escapes the storm water system containment and is discharged to Blackbrook Creek, Lubrizol's Emergency Response Organization would immediately deploy, as necessary, absorbent and containment booms up to 1000' at strategic points along Blackbrook Creek. (It should be noted that only during excessively heavy rain is storm water discharged to Blackbrook Creek. Typically all water from the facility's storm sewer system is pumped from the storm sewer retention basin to the process wastewater treatment system or to the Painesville City Wastewater Treatment Plant via sanitary sewer.)

Oil storage capacity for recovered material: Storage of the spilled material could take place at the Lubrizol facility if necessary. The process effluent treatment system has the capability to hold 750,000 gallons of material in two surge tanks and Lubrizol typically has twenty (20) 20,000 gallon empty tank cars on-site (or available within 12 hours) which could be used in case of an emergency.

Lubrizol's small discharge OSRO, would be contacted promptly to initiate response, as required. As indicated in the OSRO documents, found in Appendix II, the selected OSRO has the capability to contain and remove the spilled material. It is expected that the OSRO could respond to a spill discharge within 2 (two) hours.

Medium Discharge

A medium discharge scenario is defined as a line failure/gasket failure on one of the lines which continually circulates material throughout the operating area of the facility. This discharge is estimated at approximately 12,000 gallons (285 barrels).

In the event a spill would occur in the facility, escape secondary containment, then escape the storm water system containment and be discharged to Blackbrook Creek, Lubrizol Emergency Response Organization would immediately deploy, as necessary, absorbent and

containment booms at strategic points along Blackbrook Creek. (It should be noted that only during excessively heavy rain is storm water discharged to Blackbrook Creek. Typically all water from the facility's storm sewer system is pumped from the storm sewer retention basin to the process wastewater treatment system or to the Painesville City Wastewater Treatment Plant via sanitary sewer.)

Oil storage capacity for recovered material: Storage of the spilled material could take place at the Lubrizol facility if necessary. The process effluent treatment system has the capability to hold 750,000 gallons of material in two surge tanks and Lubrizol typically has twenty (20) 20,000 gallon empty tank cars on-site (or available within 12 hours) which could be used in case of an emergency.

Lubrizol's medium discharge OSRO, would be contacted promptly to initiate response, as required. As indicated in the OSRO documents, found in Appendix II, The selected OSRO has the capability to contain and remove the spilled material. It is expected that the OSRO could respond to a spill discharge within 2 (two) hours.

1.5.2 Worst Case Discharge

The worst case discharge would be the loss of containment for the facility's largest oil storage tank. The storage tank has a capacity of one million gallons. It is located within a secondary containment dike, which is capable of holding the entire contents of the tank plus sufficient freeboard for precipitation. In addition, this tank and associated tank farm are located within the boundaries of the facility's storm water drainage system. Thus, if a breach would occur in the secondary containment dike, the storm water drainage system would still be available to retain spilled material on-site.

In the event a spill of this size occurs and escapes the tank farm dike, containment in the storm water system and was discharged into Blackbrook Creek, Lubrizol's Emergency Response Organization would immediately deploy absorbent and containment booms at strategic points along Blackbrook Creek. Lubrizol's worst-case discharge OSRO would be contacted promptly to initiate response. As indicated in the OSRO documentation (Appendix II), the selected OSRO has the capability to contain and remove the spilled material. This was specifically prepared based on review of the following Worksheet from Part 112 Appendix E, "Worksheet to Plan Volume of Response Resources for Worst Case Discharge", as completed by Lubrizol. As documented in Appendix II, the selected OSRO can respond to an incident within the required Tier 1, 2 and 3 constraints.

Oil storage capacity for recovered material: Storage of the spilled material could take place at the Lubrizol facility if necessary. The process effluent treatment system has the capability to hold 750,000 gallons of material in two surge tanks and Lubrizol typically has twenty (20) 20,000 gallon empty tank cars on-site (or available within 12 hours) which could be used in case of an emergency.

Attachments to Appendix E

ATTACHMENT E-1 --
WORKSHEET TO PLAN VOLUME OF RESPONSE RESOURCES
FOR WORST CASE DISCHARGE

Part I Background Information

Step (A) Calculate Worst Case Discharge in barrels (Appendix D) 23,800
(A)

Step (B) Oil Group¹ (Table 3 and section 1.2 of this appendix) GROUP 3

Step (C) Operating Area (choose one) ☒ Nearshore/Inland Great Lakes ☐ or Rivers and Canals

Step (D) Percentages of Oil (Table 2 of this appendix)

Percent Lost to Natural Dissipation	Percent Recovered Floating Oil	Percent Oil Onshore
30	50	50
(D1)	(D2)	(D3)

Step (E1) On-Water Oil Recovery $\frac{\text{Step (D2)} \times \text{Step (A)}}{100}$ 11,900
(E1)

Step (E2) Shoreline Recovery $\frac{\text{Step (D3)} \times \text{Step (A)}}{100}$ 11,900
(E2)

Step (F) Emulsification Factor
(Table 3 of this appendix) 2.0
(F)

Step (G) On-Water Oil Recovery Resource Mobilization Factor
(Table 4 of this appendix)

Tier 1	Tier 2	Tier 3
0.15	0.25	0.40
(G1)	(G2)	(G3)

¹ A facility that handles, stores, or transports multiple groups of oil must do separate calculations for each oil group on site except for those oil groups that constitute 10 percent or less by volume of the total oil storage capacity at the facility. For purposes of this calculation, the volumes of all products in an oil group must be summed to determine the percentage of the facility's total oil storage capacity.

[Part 112, Appendix E]

ATTACHMENT E-1 (CONTINUED) --
 WORKSHEET TO PLAN VOLUME OF RESPONSE RESOURCES
 FOR WORST CASE DISCHARGE

Part II On-Water Oil Recovery Capacity (barrels/day)

Tier 1	Tier 2	Tier 3
3570	5950	9520
Step (E1) x Step (F) x Step (G1)	Step (E1) x Step (F) x Step (G2)	Step (E1) x Step (F) x Step (G3)

Part III Shoreline Cleanup Volume (barrels)

23,800
 Step (E2) x Step (F)

Part IV On-Water Response Capacity By Operating Area
 (Table 5 of this appendix)
 (Amount needed to be contracted for in barrels/day)

Tier 1	Tier 2	Tier 3
5000	10,000	20,000
(J1)	(J2)	(J3)

Part V On-Water Amount Needed to be Identified, but not Contracted for in Advance (barrels/day)

Tier 1	Tier 2	Tier 3
0	0	0
Part II Tier 1 - Step (J1)	Part II Tier 2 - Step (J2)	Part II Tier 3 - Step (J3)

NOTE: To convert from barrels/day to gallons/day, multiply the quantities in Parts II through V by 42 gallons/barrel.

[Part 112, Appendix E]

1.6

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1.6 DISCHARGE DETECTION SYSTEMS

1.6.1 Discharge Detection by Personnel

- 1.6.1.1 Detection procedures
- 1.6.1.2 Discussion of facility inspections
- 1.6.1.3 Initial response actions

1.6.2 Automated Discharge Detection

- 1.6.2.1 Equipment description
- 1.6.2.2 Alarm verification procedures
- 1.6.2.3 Initial response actions

1.6 DISCHARGE DETECTION SYSTEMS

1.6.1 Discharge Detection by Personnel

1.6.1.1 Detection Procedures

Written procedures used when operating the plant contain language concerning spill potential and detection. See Lubrizol-Painesville's SPCC Plan Regulatory Cross-Reference 112.7(a)(3)(ii) (Appendix III).

1.6.1.2 Discussion of Facility Inspections

See 1.6.1.1 above.

1.6.1.3 Initial Response Actions

Upon detecting a spill or other emergency situation, employees are trained to pull the emergency alarm for assistance. Immediate response from the Lubrizol Emergency Response Organization will follow.

1.6.2 Automated Discharge Detection

1.6.2.1 Equipment Description

Both the process waste water treatment system and storm sewer retention basin are equipped with continuous pH monitoring to detect potential spills within the plant. Non-oil spills of materials that would raise or lower the pH would be detected. On both systems, alarms will sound if a low or high pH excursion occurs, to alert the sewer operator of a potential problem. The pH probes are cleaned and calibrated every two weeks.

1.6.2.2 Alarm Verification Procedures

Upon receiving the alarm, the sewer operator investigates the situation and contacts the fire chief if any abnormalities are found. Once contacted, the fire chief would inform each area of the plant to inspect for possible causes.

1.6.2.3 Initial Response Actions

Upon detecting a spill or other problem, employees are trained to activate the emergency alarm for assistance. Immediate response from the Lubrizol Emergency Response Organization will follow.

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1.7 PLAN IMPLEMENTATION

1.7.1 Response Resources

1.7.2 Disposal Plans

1.7.3 Containment and Drainage Planning

1.7 PLAN IMPLEMENTATION

1.7.1 Response Resources

As indicated in Section 1.5 Discharge Scenarios, Lubrizol's Emergency Response Organization will respond immediately to all spills. Lubrizol has available, on-site, the following to control spills at the facility:

- Bulk sorbent material
- Absorbent pillows
- Portable pumps
- Storage containers
- Tank trucks
- Empty drums
- Absorbent booms
- Inflatable pipe plugs of various sizes to stop flow in drain tiles up to 72" diameter
- Overpack drums
- Sand
- Shovels
- Dump truck
- Backhoe/loader
- Personnel safety equipment
- 1000' of containment boom

A detailed list of the spill control materials stored on Lubrizol's HazMat vehicle is listed in Section 1.3.2 Equipment. The selected OSRO will be contacted to help contain, recover and store the spilled material. Contractor capabilities, available equipment and response times are included in the contractor's response documentation found in Appendix II.

The members of Lubrizol's Emergency Response Organization (ERO) are trained to handle all types of emergencies including spills. Section 1.8.3 Training and Meeting Logs details member training. The qualifications of contractor employees are included in the contractor's response documentation found in Appendix II.

The selected OSRO has individuals on staff that have years of practical and theoretical experience. These individuals can be consulted if expert advice is required.

1.7.2 Disposal Plans

The following page (Section G-4f and G-4g) from the facility's RCRA Contingency Plan addresses disposal of released/spilled materials. All wastes produced as a result of a spill would be characterized as required by 40 CFR261 prior to treatment or disposal. As indicated in the pages from the RCRA Contingency Plan, the only on-site treatment which could take place would be incineration and/or phase separation. Non-hazardous aqueous waste from a spill clean-up may be treated in the process sewer system/POTW, if it is consistent with the facility's

Industrial Discharge Permit. For wastes that cannot be handled on-site, Lubrizol uses the following facilities to properly treat and/or dispose of wastes.

Heritage – WTI, Inc. D.B.A. WTI
1250 St. George St.
East Liverpool, Ohio 43920
EPA I.D. # OHD980613541

Systech Environmental Corp.
P.O. Box 166
11397 County Rd. 176
Paulding, OH 45879
EPA I.D. # OHD005048947

Systech Environmental Corp.
1420 S. Cement Rd.
Fredonia, KS 66736
EPA I.D. # KSD980633259

Wastes produced as a result of a release/spill could be sent off-site to one or more of the above listed TSD's if necessary for proper treatment and disposal. Other approved TSDF's may be used based on the specific waste generated and approved disposal methods applicable to the waste.

1.7.3 Containment and Drainage Planning

Facility containment and drainage planning is detailed in the Lubrizol-Painesville's SPCC Plan (Appendix III). SPCC-required inspection and monitoring information can be found in the Lubrizol-Painesville's SPCC Plan (Appendix III).

Off-site containment and drainage planning has resulted in the construction of a map which illustrates the plant, Blackbrook Creek and Mentor Marsh. Information including the location of culvert pipes and corresponding dimensions are shown for use during a spill incident. On-going training will continue and involves local fire departments in anticipation of providing assistance during a spill incident. It is important that this information be readily available to responders during an incident. A copy of the Site Drainage Plan discussed above can be found in 1.9 Diagrams.

G-4f Storage and Treatment of Released Material

OAC 3745-54-56 (G)

After an emergency, qualified Lubrizol personnel will provide for storing or disposing of the recovered waste, contaminated water, or any other material that results from a release, fire, or explosion at the facility, according to all applicable regulations.

Any spilled materials or recovered wastes will be promptly put into either water tight containers or steel drums depending on the nature of the waste. These storage containers will be stored outside the area where the emergency occurred so that they cannot cause any additional problems to the cleanup or repair work needed at the site of the emergency. All recovered wastes that are classified as ignitable will be stored only in areas of the facility that are designed for flammable/ignitable materials. All recovered wastes will be segregated from any other incompatible or reactive materials. All containers will be protected from further dilution by rainfall or other airborne contaminants.

The only on-site treatment will be incineration, phase separation, neutralization or blending. Procedures for the evaluation of released hazardous waste materials prior to on-site incineration, including evaluations for compatibility, are described in Section C-2, the Waste Analysis Plan. If wastes cannot be incinerated on-site, they will be evaluated, manifested, and transported off-site to an appropriately permitted TSDF. Off-site treatment includes, but is not limited to, incineration, fuels substitution, and organics recovery. The specific location of this TSDF will be determined depending on the type and nature of the material.

G-4g Incompatible Waste

OAC 3745-54-56 (H)(1)

All potentially incompatible waste materials are reviewed by qualified Lubrizol personnel, prior to treatment, storage or disposal. Wastes from emergency response cleanups will generally be stored separately from process wastes. Based on the assessment of wastes resulting from emergency operations, sampling and analysis (if appropriate) will be conducted in accordance with SW-846 methodologies. No wastes that may be incompatible with the released material will be treated, stored or disposed of until cleanup procedures are complete.

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1.8 SELF-INSPECTION, DRILLS/EXERCISES, AND RESPONSE TRAINING

1.8.1 Facility Self-Inspection

1.8.1.1 Tank Inspection

1.8.1.2 Response Equipment Inspection

1.8.1.3 Secondary Containment Inspection

1.8.2 Facility Drills/Exercises

1.8.3 Training and Meeting Logs

1.8.3.1 Personnel training logs

1.8.3.2 Discharge Prevention Meeting Log

1.8 SELF-INSPECTION, DRILLS/EXERCISES, AND RESPONSE TRAINING

1.8.1 Facility Self-Inspection

The facility operates 24 hours per day, 365 days per year. All processing and bulk storage areas are manned as necessary to operate the plant safely and without incident as evidenced by the facility's spill history. Employees are trained to be aware of potential problems and act proactively if a potential problem is discovered. During typical operations, tanks and secondary containment are observed by many individuals. If a potential problem exists, employees can access the Maintenance Work Order (MWO) system, which is readily available on the facility's computer system, and request repair. The MWO system allows for prioritization of work requests, thus the repair will be done based on the employee's determination of importance. Additionally, the MWO system enables the facility to track MWOs so reoccurring problems can be addressed as necessary. Data within the MWO system can be reviewed back in excess of five (5) years.

1.8.1.1 Tank Inspection

Tank farm and storage tank inspection is performed according to a formally documented work instruction (Procedure 03-4.15-361-1075). Work instructions detail how a job is to be done properly. In this case the work instruction details how an operator is to inspect a tank farm and related storage tanks. The tank farms including tanks, pumps, pads, pipe racks, dikes and ground area are inspected at the beginning of each shift. Thus, an inspection is completed twice daily. The work instruction indicates that if problems are discovered, they should be documented, the operator should correct the problem if possible and the production shift supervisor should be notified. Completed inspection forms are kept electronically for three years on the plant's intranet system and hard copies, for convenience, may be kept locally at the tank farm or shift supervisors office.

1.8.1.2 Response Equipment Inspection

Response equipment is kept securely inside the HazMat vehicle and spill trailer, which is centrally located within the facility at all times. The HazMat vehicle is immediately available for response to an incident. A list of equipment on the HazMat vehicle by item and quantity is located in Section 1.3.2.1 Equipment List. After each use of the vehicle to respond to an

incident, inventory of the items is performed and items are restocked as necessary. All equipment is maintained regularly so it will perform as designed during an incident. All equipment is tested in accordance with manufacturer's recommendations. Equipment requiring testing is documented after each event in which the equipment is used or inspection and/or inventory takes place. If in an incident, equipment requiring testing is used, testing and appropriate documentation is completed when post incident inspection and/or inventory takes place.

1.8.1.3 Secondary Containment Inspection

Secondary containment around the bulk storage areas consists of earthen, non-permeable clay dikes and/or reinforced concrete retaining walls. Operators are trained to be aware of potential problems with secondary containment such as: cracks, discoloration, erosion and drainage valve condition. If a potential problem is discovered, operators are trained to document observation(s) and inform the production shift supervisor of potential problems. (See Section 1.8.1.1 Tank Inspection for additional information.)

1.8.2 Facility Drills / Exercises:

Lubrizol-Painesville conducts both internal and external drills/exercises based on the PREP guidelines. These occur during the annual ERO training, during an actual emergency and/or with outside fire departments. These records are kept both as hard copies and electronically under management by the ERO Coordinator.

QI notification drill: during facility drills/exercises and emergencies, the shift EHS Coordinator is immediately contacted by radio and/or telephone. Depending on the scenario, the QI/ERO Coordinator, if he is not on shift at the time, can be notified immediately by telephone and/or pager.

Spill management team tabletop exercise: the spill management team consists of the plant Emergency Response Organization (ERO). This exercise is performed by each of (4) shifts at least once a year and involves a worst case scenario.

Equipment deployment exercise: the equipment deployment is performed during an annual ERO training, during an actual emergency if needed and by the OSRO.

Unannounced exercise: Lubrizol-Painesville conducts annual mock drills for training of the Emergency Response Organization (ERO). Some of the drills conducted are unannounced drills. These drills include response to fires, spills and/or rescue situations. Numerous times the drill will combine spills and rescues, fires and spills and/or fires and rescues.

Area exercise: Along with the in-house ERO, Lubrizol regularly invites outside local community fire departments to participate in drills/exercises within our facility. This gives them familiarity with the layout of the site, Lubrizol-Painesville's emergency response equipment and capabilities and a working relationship with the organization. Five ERO members are on the Lake County Hazardous Intervention Team (HIT) and annually participate in drills that involve containing spills. Some of Lubrizol-Painesville ERO members have also participated in a waterway drill with the Lake County Hazardous Materials Response Team and the U.S. Coast Guard on August 12/13, 1997.

DESCRIPTION OF EVALUATION PROCEDURES FOR DRILL PROGRAM:

1.8.2.1 Qualified Individual Notification Drill Log

Each ERO training or outside exercise program involves the Qualified Individual (ERO Coordinator or Instructor) and a written agenda. As indicated below in 1.8.3.1, personnel response training logs, all of the training agendas, dates, times, etc. are kept on the computer system.

In addition, all actual emergency responses are electronically logged into the facility Emergency Report database. A description of the scenario, an evaluation, and recommendations and/or changes to be made is also recorded.

1.8.2.2 Spill Management Team Tabletop Drill Log

Please see section 1.8.2.1.

1.8.3 Response Training:

Emergency Response (ERO) personnel receive extensive training. Initially all ERO members receive the following:

- Firefighting - 36 hour basic course
- Hazardous materials technician

Then annually:

- First responder awareness and first responder operational, including hazardous materials training – 24 hours

In addition, ERO officers receive incident command, hazardous materials incident command and courses dealing with the media.

1.8.3.1 Personnel Response Training Logs

Personnel training records are maintained on the facility's computer system and on hard copy. The record indicates the type of training, name of the person receiving the training, the individual name providing the training, date of training and length of training time.

1.8.3.2 Discharge Prevention Meeting Logs

Discharge prevention is taught and continually emphasized to all employees in the plant that may be involved with the handling and/or managing of chemicals. This is done primarily through monthly safety and ERO training. All personnel training records are maintained on the facility's computer system.

The ERO members attend training specific to spill response. During the training the following items are covered:

- Oil Pollution Act of 1990 requirements
- Spill containment methods
- Flow route of Blackbrook Creek
- Areas along the creek where spill containment methods may be used
- Hands-on training with absorbent and containment booms
- Hands-on training with inflatable pipe plugs

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1.9 DIAGRAMS

Diagram 1 (PLD5-131-003, sheet 3 of 4) illustrates:

1. Entire facility to scale
2. Above ground bulk storage tanks with tank numbers (Lubrizol-Painesville has no underground storage tanks).
3. Tank capacities are referenced in 1.4.1
4. Drum storage locations are shaded on the diagram.
5. Process buildings are illustrated on the diagram.
6. Transfer areas are shaded on the diagram.
7. Secondary containment systems are shown.
8. Hazardous materials are used in processing throughout the active area of the facility.
9. Location of electrical equipment that might contain oil. The map illustrates all the Sub-Main Transformers (SMT's) in the plant.

Diagram 2 (PLD5-620-007) illustrates:

1. Fire fighting water sources

Diagram 3 (PLD5-612-068) illustrates:

1. Major sanitary and storm sewers, manholes and drains
2. Weirs and shut-off valves
3. Surface water-receiving streams
4. Equipment transportation routes
5. Direction of spill flow from release points

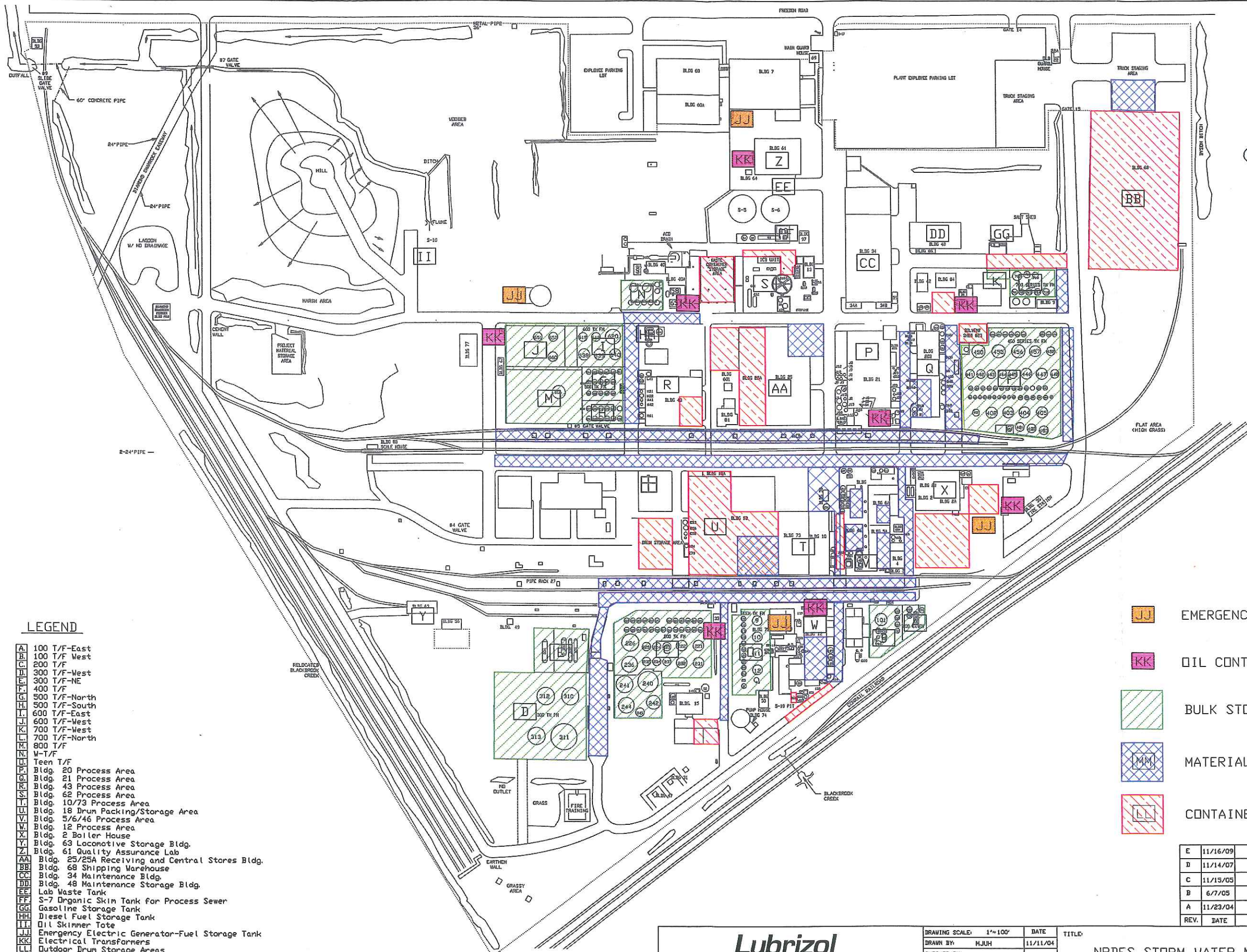
Diagram 4 (PLD5-960-026) illustrates:

1. Site plan diagram with roadway evacuation routes
2. Location of evacuation assembly points
3. Location of communication and emergency response equipment (see Bldg. 36 Fire Station).
4. Response personnel ingress and egress (to and from the Equipment Staging Area). See gate locations on diagram.

Diagram 5 (Site Drainage Plan) illustrates:

1. Flowpath of Blackbrook Creek

2. Culvert pipe locations and sizes
3. Plant storm water outfall location (Storm Water Basin)



LEGEND

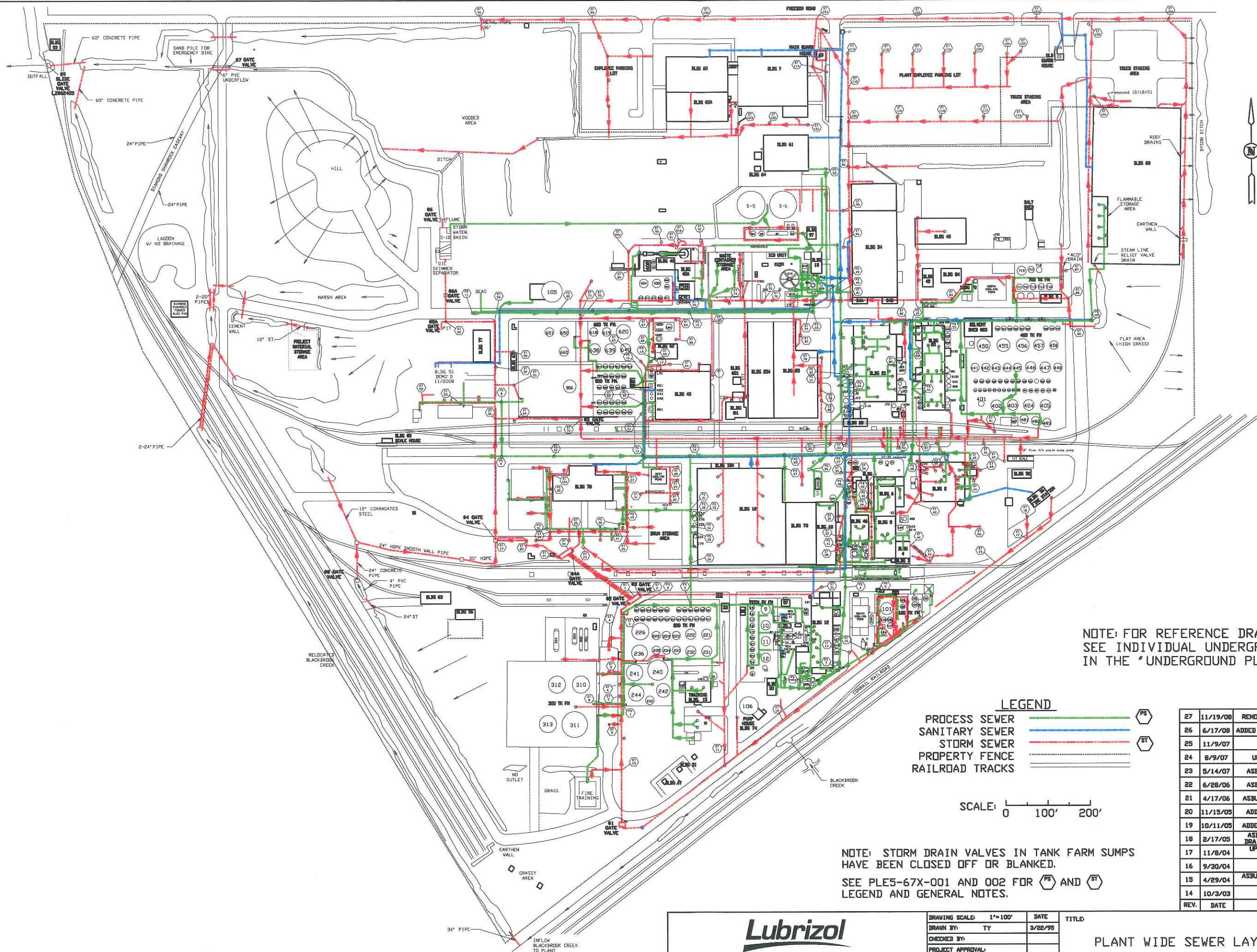
- A. 100 T/F-East
- B. 100 T/F West
- C. 200 T/F
- D. 300 T/F-West
- E. 300 T/F-NE
- F. 400 T/F
- G. 500 T/F-North
- H. 500 T/F-South
- I. 600 T/F-East
- J. 600 T/F-West
- K. 700 T/F-West
- L. 700 T/F-North
- M. 800 T/F
- N. W-T/F
- O. Teen T/F
- P. Bldg. 20 Process Area
- Q. Bldg. 21 Process Area
- R. Bldg. 43 Process Area
- S. Bldg. 62 Process Area
- T. Bldg. 10/73 Process Area
- U. Bldg. 18 Drum Packing/Storage Area
- V. Bldg. 5/6/46 Process Area
- W. Bldg. 12 Process Area
- X. Bldg. 2 Boiler House
- Y. Bldg. 63 Locomotive Storage Bldg.
- Z. Bldg. 61 Quality Assurance Lab
- AA. Bldg. 25/25A Receiving and Central Stores Bldg.
- BB. Bldg. 68 Shipping Warehouse
- CC. Bldg. 34 Maintenance Bldg.
- DD. Bldg. 48 Maintenance Storage Bldg.
- EE. Lab Waste Tank
- FF. S-7 Organic Skim Tank for Process Sewer
- GG. Gasoline Storage Tank
- HH. Diesel Fuel Storage Tank
- II. Oil Skimmer Tote
- JJ. Emergency Electric Generator-Fuel Storage Tank
- KK. Electrical Transformers
- LL. Outdoor Drum Storage Areas
- MM. Outdoor Loading/Unloading Racks and Transfer Piping

LEGEND

- JJ EMERGENCY GENERATOR FUEL OIL
- KK OIL CONTAINING ELECTRICAL XFMR
- Green hatched BULK STORAGE AREAS
- MM MATERIAL LOADING AND UNLOADING
- LL CONTAINER STORAGE AREAS

E	11/16/09	UPDATED DRAWING BACKGROUND	HJH	GEND
D	11/14/07	UPDATED DRAWING BACKGROUND	HJH	GEND
C	11/15/05	ADDED SLIDE GATE VALVE #9 PER PV-858	HJH	CAJ
B	6/7/05	ADDED SECOND LEGEND	HJH	CAJ
A	11/23/04	ISSUED WITH PERMIT APPLICATION	HJH	CAJ
REV.	DATE	REVISION DESCRIPTION	DRAWN	APP.


Lubrizol		DRAWING SCALE: 1"=100'	DATE: 11/11/04	TITLE: NPDES STORM WATER MAP DRAWING #3	DRAWING NO. PLD5-131-003 3 OF 4	REV. E
155 FREEDOM RD. PAINESVILLE PLANT PAINESVILLE, OHIO		DRAWN BY: HJH	CHECKED BY:	PROJECT APPROVAL:	CADD NUMBER: PL131003	
		C. E. APPROVAL:	PROJECT NUMBER:			





NOTE: FOR REFERENCE DRAWINGS
SEE INDIVIDUAL UNDERGROUND PLOT DRAWINGS
IN THE "UNDERGROUND PLOTS" FOLDER

LEGEND

PROCESS SEWER
SANITARY SEWER
STORM SEWER
PROPERTY FENCE
RAILROAD TRACKS

SCALE: 

NOTE: STORM DRAIN VALVES IN TANK FARM SUMPS
HAVE BEEN CLOSED OFF OR BLANKED.
SEE PLE5-67X-001 AND 002 FOR  AND 
LEGEND AND GENERAL NOTES.

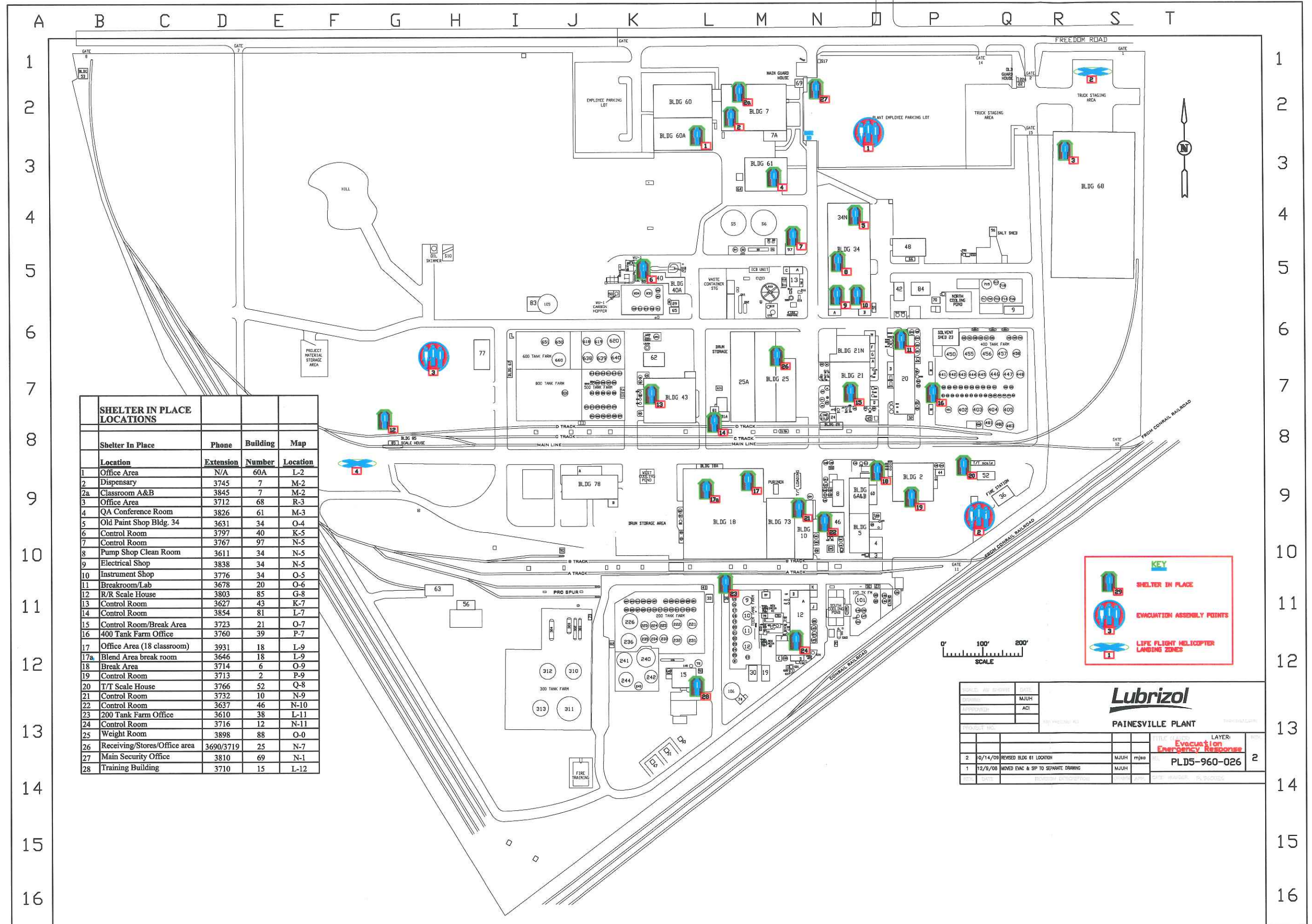
27	11/19/08	REMOVED BLDG 51 & ASSOCIATED EQUIPMENT	NJUH	
26	6/17/08	ADDED 146, D-115 & D-125 & NEW FUME INCINS	NJUH	
25	11/9/07	ADDED T/T STAGING & 178 TANK	NJUH	EGZ
24	8/9/07	UPDATED STORM SEWER LOC OF WHRI	NJUH	EGZ
23	5/14/07	ASBUILT PER PV-102SD (NOCM2007083))	NJUH	MISG
22	6/28/06	ASBUILT PER PV-881 (BLDG 20 PS-45A)	NJUH	MISG
21	4/17/06	ASBUILT PER PV-818 (REPLACED S-18 PIT)	NJUH	EGZ
20	11/15/05	ADDED SLIDE GATE VALVE #9 PER PV-858	NJUH	MISG
19	10/11/05	ADDED NOTE FOR EMERGENCY DIKE SANDPILE	NJUH	CAJ
18	2/17/05	ASBUILT UPDATE (ADDED PROCESS SEWER DRAINS IN BLDG 68 FLAMMABLE STG AREA)	NJUH	PTS
17	11/8/04	UPDATED STORM SEWER DRAINAL POINTS AND DRAINAGE BASINS	NJUH	CAJ
16	9/30/04	UPDATED PER PV-732E ADDED 24" GATE VALVE #8	NJUH	
15	4/29/04	ASBUILT UPDATE PROCESS SEWER LINE NEAR SPECIAL PRODUCTS BLDG AT PS-30	NJUH	
14	10/3/03	ADDED "ACO" DRAIN AT 700 TK FM	NJUH	
REV.	DATE	REVISION DESCRIPTION	DRAWN	APP.

Lubrizol

DRAWING SCALE:	1"=100'	DATE
DRAWN BY:	TY	3/22/95
CHECKED BY:		
PROJECT APPROVAL:		
C. E. APPROVAL:		
PROJECT NUMBER:		

PLANT WIDE SEWER LAYOUT

DRAWING NO.	REV.
PLD5-612-068	27
CADD NUMBER: PL61B068	





Painesville Plant

July 1, 1996

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Houston, TX (713) 447-8300

SITE DRAINAGE PLAN



KEY

- 1) Property Lines are noted in **RED**.
- 2) See location of Gate Valve and Walk Bridge in vicinity of Building 53.
- 3) Indicates Concrete Culvert Pipe.
 - A** - 42" I.D.
 - B** - 24" X 48" I.D.
 - C** - 40" I.D.
 - D** - 24" X 36" I.D. (2)
 - E** - 54" I.D.
 - F** - 72" I.D.
 - G** - 72" I.D.
 - H** - 58" X 86" I.D.
 - I** - 60" X 96" Box Culvert
 - J** - 84" I.D.
 - K** - 54" I.D.
- 4) Containment Devices and Materials may be placed at the following 4 Culvert Points:

- 1) **F**
- 2) **H**
- 3) **J**
- 4) **K**



1.10

OIL POLLUTION ACT OF 1990
MANUAL

1.10 SITE SECURITY - CONTENTS

1.10 SITE SECURITY

Contained within the secured area of the plant are all emergency cut-off locations, enclosures, lighting, valve and pump locks and pipeline connection caps.

The security forces are made up of fulltime and contract security. One security officer staffs the main guard house and one staffs the east truck gate 24 hours a day, 7 days a week, 365 days a year. The truck gate security officers conduct a minimum of 2 perimeter inspections per day. The times of the inspections vary and routes are periodically changed so as not to be routine. The perimeter fencing is inspected for breaches and any other suspicious or unsafe conditions. The facility is completely fenced with a six-foot chain link fence with three strands of barbed wire at the top. Security cameras, controlled from the main guard house, monitor various areas of the plant.

All employees have a picture identification badge that is used to pass through a secured turnstile to enter and exit and which is recorded on a computer. This system documents who is on site at all times. All visitors must sign in and out in the security building and obtain and display a visitor badge. Visitors are escorted at all times.

In addition, a parking hang tag is required for visitors' and contractors' vehicles that enter the facility. These are also issued at the main security guardhouse.

2.0

OIL POLLUTION ACT OF 1990
MANUAL

2.0 RESPONSE PLAN COVER SHEET

2.1 General Information

Facility owner/operator
Latitude and longitude
Dun and Bradstreet number
Standard industrial classification (SIC) code
Largest above ground storage tank capacity (gallons)
Maximum oil storage capacity
Number of Above ground storage tanks
Worst case discharge amount
Facility distance to navigable waters

Facility Response Plan General Information

(standardized format grid/chart)

**Attachment C-III, Certification of Substantial Harm
Determination Form**

2.0 Response Plan Cover Sheet

2.1 General Information

Facility Owner:	The Lubrizol Corporation 29400 Lakeland Boulevard Wickliffe Lake County Ohio 44092 (440) 943-1200
Operator:	The Lubrizol Corporation - Painesville Plant (Same as Facility Name and Location)
Latitude:	N41° 43' 13"
Longitude:	W81° 16' 25"
Dun and Bradstreet Number:	004172623
Standard Industrial Classification (SIC) Code:	2869
Largest Aboveground Oil Storage Tank Capacity (gallons):	1,000,000 gallons
Maximum Oil Storage Capacity:	12,005,500 gallons
Number of Above Oil Storage Tanks (AST's):	244
Worst Case Discharge Amount (gallons):	1,000,000
Facility Distance to Navigable Water:	0-1/4 mile

Facility Response Plan General Information

FRP Number:	FRP0500101
Facility Name:	Lubrizol Corp. – Painesville Plant
Facility Address:	155 Freedom Road Painesville, Ohio 44077
Telephone:	(440) 357-7064
Date FRP Submitted:	1995
Mailing Address (if different from facility address):	Same
Facility Owner:	The Lubrizol Corporation
Owner Address:	29400 Lakeland Blvd. Wickliffe, Ohio 44092
Telephone:	(440)943-1200
Name of Protected Waterway or Environmentally Sensitive are:	Blackbrook Creek
Distance from Facility	0 – ¼ mile
Worst Case Discharge Amount:	1,000,000 gal.
Facility Total Oil Storage Capacity:	12,005,500 gal.
Total Number of ASTs:	244
Total Number of USTs:	None
Total UST Oil Storage:	None
Total Storage of Drums/Small Containers:	36,000 drums/300 pails
Qualified Individual Response Time:	Immediate (alarm) – 20 minutes
Asst. Qualified Individual Response Time	Immediate (alarm)
OSRO Response Time:	1-2 hrs.
Is the Exercise Program Based on PREP Guidelines?	Yes
Is the FRP consistent with the ACP?	Yes
Is the Facility Located in a Sub Area? (Specify Sub Area)	Yes, Northeast Ohio Contingency Plan
Is the FRP Consistent with the Sub Area Plan?	Yes
Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000 gallons?	No
Does the facility have a total oil storage capacity greater than 1 million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground oil storage tank area?	No

Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance such that a discharge could cause injury to fish or wildlife and sensitive environments?	Yes
Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located a distance such that a discharge from the facility would shut down a public drinking water intake?	No
Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and has the facility experienced a reportable oil spill in an amount of greater than or equal to 10,000 gallons within the last 5 years?	No
Date of FRP Review:	12/1/09
Reviewed By:	Gwendolyn McDay

Attachment C-III
Certification of Substantial Harm Determination Form

Attachment C-III

CERTIFICATION OF THE APPLICABILITY OF THE SUBSTANTIAL HARM

Facility Name: The Lubrizol Corporation
Facility Address: 155 Freedom Rd.
Painesville, OH 44077

1. Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000 gallons?

Yes _____ No ✓

2. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground oil storage tank area?

Yes _____ No ✓

3. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Appendix C-III of 40 CFR 112.20 or a comparable formula) such that the discharge from the facility could cause injury to fish and wildlife sensitive environments?

Yes ✓ No _____

4. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Appendix C-III of 40 CFR 112.20 or a comparable formula) such that the discharge from the facility would shut down a public drinking water intake?

Yes _____ No ✓

5. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons within the last 5 years?

Yes _____ No ✓

Certification:

I certify under penalty of law that I have personally examined and am familiar with the information submitted above, and that based on my inquiry of those individuals responsible for obtaining information, I believe that the submitted information is true, accurate, and complete."

Name (Type or Print)	Title
CRAIG A. HUPP	GENERAL MANAGER
Signature	Date
<u>Craig A. Hupp</u>	23 - DECEMBER 2009

**FOR APPROVED
DATE NO. 2000
APPROVAL EXPRES DATE**

This form is intended to be computer readable. To complete this form, entirely fill in the desired circle with black or blue ink. Please do not fold, staple, or mutilate this form. Return this form in a 9" x 12" envelope. Please print requested information in BOXES for each individual question.

INCORRECT MARKS

☐ ☒ ☐ ☐ ☐

EXAMPLE:

[illegible][illegible][illegible]

This form is designed to accompany a submitted Response Plan.

Explanations and detailed instructions can be found in Appendix G.

Facility Information contained here will be returned with the Response Plan.

[illegible]

MAXIMUM STORAGE CAPACITY (GALLONS)		1	2	3	4	5	6	7	8	9
0	0	0	1	2	3	4	5	6	7	8
1	1	2	3	4	5	6	7	8	9	0
2	2	3	4	5	6	7	8	9	0	1
3	3	4	5	6	7	8	9	0	1	2
4	4	5	6	7	8	9	0	1	2	3
5	5	6	7	8	9	0	1	2	3	4
6	6	7	8	9	0	1	2	3	4	5
7	7	8	9	0	1	2	3	4	5	6
8	8	9	0	1	2	3	4	5	6	7
9	9	0	1	2	3	4	5	6	7	8

NUMBER OF TANKS	2	4	0	0	1	2	3	4	5	6	7	8	9
	0	1	2	3	4	5	6	7	8	9	0	1	2

public reporting burden for the collection of this information is estimated to vary from one hour to 270 hours per response in the first year, with an average of 53 hours per response. The estimate includes time for reviewing instructions, searching existing data sources, gathering the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any aspect of this information collection, including suggestions for reducing the burden to: Chief, Information Policy Branch, PM-223, U.S. Environmental Protection Agency, 401 M Street, SW, Washington, D.C. 20460, and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, D.C. 20503.

FACILITY INFORMATION

(CONTINUED)

REMEMBER

USE BLACK OR BLUE INK
DO NOT FOLD, STAPLE, OR MUTILATE THIS FORM

FACILITY ADDRESS		Direct address, route or box	
Indicate a space in the address by filling in the blank circle at the top of the column.			
1	5	2	3
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34	35		

DETERMINATION OF SUBSTANTIAL HARM

Does the facility operation include over-water transfers* of oil to or from vessels and does the facility have a maximum capacity greater than or equal to 42,000 gallons?

☐ YES ☐ NO

Does the facility have adequate secondary containment* for each aboveground storage area sufficiently large to contain the capacity of the largest aboveground storage tank within that storage area and is the total storage capacity greater than or equal to one million gallons?

☐ YES ☐ NO

Is the facility located at a distance* that would shut down a public drinking water intake and is the total storage capacity greater than or equal to one million gallons?

☐ YES ☐ NO

Is the facility located at a distance* that could cause injury to an environmentally sensitive area as referenced in Appendix D and is the total storage capacity greater than or equal to one million gallons?

☐ YES ☐ NO

Within the past five years, has the facility experienced a reportable spill* exceeding 10,000 gallons and is the total storage capacity greater than or equal to one million gallons?

☐ YES ☐ NO

* Explanations of the above referenced terms can be found in Appendix C. If an alternative formula to the ones contained in Attachment C-III is used to establish the appropriate distance to sensitive environments or drinking water intakes, documentation of the reliability and analytical soundness of the formula must be attached to this form.

ADDITIONAL INFORMATION

LATITUDE (DEGREES NORTH)		
degrees	min.	sec.
4	1	4
0	0	0
1	1	1
2	2	2
3	3	3
4	4	4
5	5	5
6	6	6
7	7	7
8	8	8
9	9	9

LONGITUDE (DEGREES WEST)		
degrees	min.	sec.
8	1	6
0	0	0
1	1	1
2	2	2
3	3	3
4	4	4
5	5	5
6	6	6
7	7	7
8	8	8
9	9	9

FACILITY DISTANCE TO NAVIGABLE WATER:
Fill the appropriate circle.

- ☒ 0 - 1/4 mile
☐ 1/4 - 1/2 mile
☐ 1/2 - 1 mile
☐ > 1 mile

● REMEMBER
 USE BLUE OR BLACK INK
 DO NOT FOLD, STAPLE, OR MUTILATE THIS FORM

CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining information, I believe that the submitted information is true, accurate, and complete.

Signature John L. Petric

Name (please type or print) John L. Petric

Title General Manager

Date 2-18-93

MANUAL
OIL POLLUTION ACT OF 1990

APPENDICES:

Appendix I - Lubrizol Emergency Response Plan

Appendix II - Inland Waters of Ohio, OSRO information

Appendix III - Lubrizol SPCC Plan

APPENDIX I

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OVERVIEW

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*Tab 3	DESCRIPTION OF PAINESVILLE PLANT

Emergency Levels

Tab 4	EMERGENCY LEVELS & NON EMERGENCY INCIDENTS
-------------	--

Emergency Organization

Tab 5	LEVEL 1 ORGANIZATION
Tab 6	LEVEL 2 OR 3 ORGANIZATION

FIRST ACTIONS

Alarms and First Response Actions

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*Tab 8	WHEN THE ALARM SOUNDS
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Tab 10	EVACUATION AND SHELTER IN PLACE
*Tab 11	FIRE HYDRANT LOCATIONS

*** Tab is NOT INCLUDED with this FRP.**

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12.03.....	SAFETY OFFICER
12.04.....	LOGISTICS/UTILITIES OFFICER
12.05.....	SECURITY OFFICER
12.06.....	COMMUNICATIONS
12.07.....	FIRE
12.08.....	MEDICAL
12.09.....	HAZMAT
12.10.....	OUTSIDE ASSISTANCE

Level 2 or 3 Emergency Checklists - ECC

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13.01.....	MANAGEMENT RESOURCES DIRECTOR
13.02.....	LIAISON COORDINATOR
13.03.....	INFORMATION COORDINATOR
13.04.....	COMPANY SPOKESPERSON
13.05.....	MANUFACTURING COORDINATOR
13.06.....	HUMAN RESOURCES COORDINATOR
13.08.....	ENVIRONMENTAL COORDINATOR
13.09.....	RECORDSKEEPER
13.10.....	HEALTH & SAFETY COORDINATOR
13.11.....	MEDIA LIAISON
13.13.....	SECURITY

Notifications

Tab 14	EMERGENCY OUTSIDE CONTACTS
Tab 15	ERO PERSONNEL LIST / EMERGENCY INCIDENT NOTIFICATIONS CALL LIST NOTIFICATION CALL LIST (links you to PVL intranet site document)
*Tab 16	REGULATORY AGENCY REPORTING

Unit Shutdowns and Other Procedures

*Tab 17	SPECIFIC UNIT SHUTDOWN PROCEDURES
*Tab 18	DECONTAMINATION
*Tab 19	SECURITY INCIDENT (Bomb Threat, Civil Disturbance, Sabotage/Terrorism, Suspicious Mail, Acts or Threats of Violence in the Workplace)
*Tab 20	MUTUAL AID/M.A.B.A.S. PROCEDURES
*Tab 21	ELECTRICAL BROWNOUT
*Tab 22	TANK TRUCK INCIDENTS

*** Tab is NOT INCLUDED with this FRP.**

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Changes/Distribution

*Tab 23 CHANGE RECORD AND NOTEBOOK DISTRIBUTION

ABBREVIATIONS

ECC	Emergency Control Center
EH&S	Environmental, Health & Safety
EMA	Emergency Management Agency
EOC	Emergency Operations Center (County)
ERO	Emergency Response Organization
L.E.P.C.	Local Emergency Planning Committee
M.A.B.A.S.....	Mutual Aid Box Alarm System

PLANT HOURS

1. "Regular Hours" are defined as 8:00 a.m. to 5:00 p.m. Monday through Friday
2. "Off Hours" are defined as weekends, holidays and 5:00 p.m. to 8:00 a.m. Monday through Friday.

EMERGENCY RESPONSE PLAN MAINTENANCE

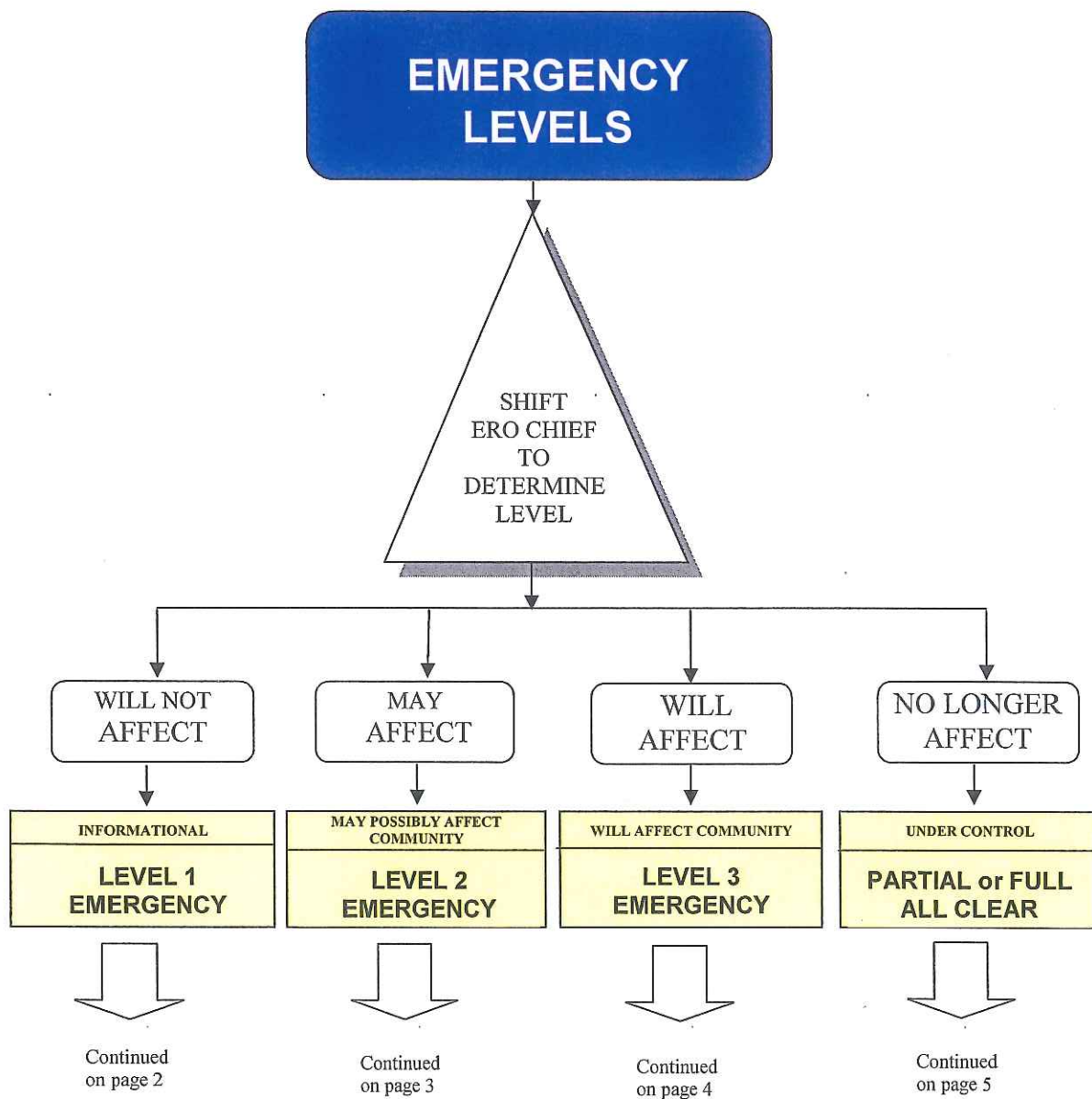
The maintenance of the ERP will be as follows:

- The Emergency Response Coordinator is responsible for maintaining and reviewing the ERP.
- At a minimum, each section of the ERP is to be reviewed for re-approval sometime during the calendar year when its last approval becomes five years old.
- Phone numbers for outside agencies will be reviewed on an annual basis and updated as appropriate.
- The ERP will be updated based upon identified changes or additional information as needed.
- Incidents resulting in ad hoc investigations; level 2 or 3 emergencies; or spills, odors; or injuries requiring a PPO assignment will be reviewed at least annually to determine if the ERP requires any revisions.

EMERGENCY LEVELS

Lubrizol

Painesville Plant



EMERGENCY LEVELS

(continued from Page 1)

WILL NOT AFFECT

LEVEL 1 EMERGENCY

1. All emergency alarms will be automatically considered a level 1 until upgraded or downgraded by the shift ERO chief.
2. Incident WILL NOT affect outside community.
3. Incident can be handled within the boundaries of Lubrizol's facility.
4. Activate emergency response incident command.
5. Evaluate the type of emergency as fire, spill/release or medical/rescue.
6. Determine the type of product or material involved.
7. PPE REQUIRED. Wear full structural level personal protective equipment.
 - a. Additional PPE possibly needed
 - Self-contained breathing apparatus may be needed.
 - Level C non-encapsulating chemical suits or higher level may be needed.
8. Incident command shall determine if the ECC needs to be activated.
9. If public concern could be raised due to incident:
 - a. Incident command shall determine if the Painesville Township Fire Department should be notified of the emergency and be placed on stand-by.
 - b. Incident command shall determine if the Painesville Township Fire Department should be requested to respond to the emergency.
 - c. Incident command shall determine if regulatory agencies should be informed of the emergency.
10. May involve outside assistance.
11. Critique.

EMERGENCY LEVELS

(continued from Page 1)

MAY POSSIBLY AFFECT COMMUNITY

LEVEL 2 EMERGENCY

1. Incident MAY affect outside community.
2. Activate emergency response incident command system.
3. Evaluate the type of emergency as fire, spill/release or medical/rescue.
4. Determine the type of product or material involved.
5. PPE REQUIRED: Wear full structural level personal protective equipment and self-contained breathing apparatus.
 - a. Additional PPE possibly needed. Level B chemical encapsulating suits or higher level may be needed.
6. Activate the ECC, if appropriate.
7. Public impact MAY occur.
 - a. Incident command must report the incident to the appropriate regulatory agencies immediately, if required.
8. Incident command or shift ERO will ensure communication to the following, if necessary:
 - a. Appraise and place Painesville Township Fire Department on stand-by.
 - b. Request the Painesville Township Fire Department to respond to the emergency.
 - c. Activate the County M.A.B.A.S. to respond to the emergency.
9. Critique.

EMERGENCY LEVELS



(continued from Page 1)

WILL AFFECT COMMUNITY

LEVEL 3 EMERGENCY

1. Incident WILL affect outside community.
2. Activate emergency response incident command system.
3. Evaluate the type of emergency as fire, spill/release or medical/rescue.
4. Determine the type of product or material involved.
5. PPE REQUIRED: Wear full structural level personal protective equipment and self-contained breathing apparatus.
 - a. Additional PPE possibly needed. Level B chemical encapsulating suits or higher level may be needed.
6. Activate the ECC.
7. PUBLIC IMPACT WILL OCCUR.
 - a. Incident command must report the incident to the appropriate regulatory agencies immediately.
8. Incident command or shift ERO chief will ensure communication to the following:
 - a. Request the Painesville Township Fire Department respond to the emergency.
 - b. Request the County M.A.B.A.S. for the emergency, if necessary.
9. Critique.

EMERGENCY LEVELS

(continued from Page 1)

NO LONGER AFFECT

ALL CLEAR UNDER CONTROL

1. Incident WILL NO LONGER affect outside community.
2. Incident within Lubrizol's facility is secure.
3. Issue all-clear for outside the plant.
 - a. Mutual aid.
 - b. L.E.P.C.
 - c. Outside community via emergency management agency.
4. Issue a partial all-clear for inside the plant when the incident is under control but still requires extended attention from the emergency response team.
 - a. Release appropriate sections of the plant to return to normal operations even though response personnel may still be required at the incident.
5. Institute a full all-clear for inside the plant when the emergency response team has completed its work.
6. Fill out emergency alarm report documentation.
7. Critique.

NON-EMERGENCY INCIDENTS

There are times when an incident occurs and an emergency alarm is not activated. When an emergency alarm is not activated, the following process will occur.

1. The shift fire chief will review the incident and determine whether the incident may cause a fire, explosion, injury, or full ERO response.
2. If the incident will cause a fire, explosion, injury, or require a full ERO response, the shift fire chief will have the emergency alarm activated.
3. If the incident will not cause a fire, explosion, injury, or a full ERO response, the shift fire chief will do the following if the incident will require more than 15 minutes to clean up or may result in injuries (slips, exposure) or release of nuisance odors.
 - a. Barricade the area
 - b. Have Security make an announcement that there is a low hazard incident in the specified area and that all non-essential personnel should stay away from the specified area.
 - c. Security will make the announcement on:
 - i. The Security Channel
 - ii. The Operations ATG Channel
 - iii. The Maintenance ATG Channel
 - iv. Email notification via # Painesville
 - v. The PA System
 - d. The shift fire chief will instruct Security to make an announcement when the incident is "All Clear".
4. All incidents that the shift fire chief is called to review will require the following:
 - a. Determine if the incident may cause off-site impact (Level 2 Emergency) or will (Level 3 Emergency) cause off-site impact.
 - b. The ECC will be activated for all incidents that may or will cause off-site impact. This includes odors, airborne releases, or releases to the storm water system that may cause off-site impact.

LEVEL 1 ORGANIZATION

ICS
INCIDENT COMMAND
SYSTEM

ECC
EMERGENCY CONTROL CENTER

MAY BE ACTIVATED IN A
LEVEL 1 EMERGENCY

MANAGEMENT RESOURCES

- GENERAL MANAGER
- COMPANY SPOKESPERSON (ALT.)



EMERGENCY



CHEMICAL
EMERGENCY



MEDICAL/RESCUE

LEVEL 1 EMERGENCY

- Initial description for any incident

LEVEL 2 EMERGENCY

- Incident which MAY affect outside areas and MAY require outside assistance

LEVEL 3 EMERGENCY

- Incident which WILL affect outside areas and/or WILL require outside assistance

LEVEL 1 ORGANIZATION

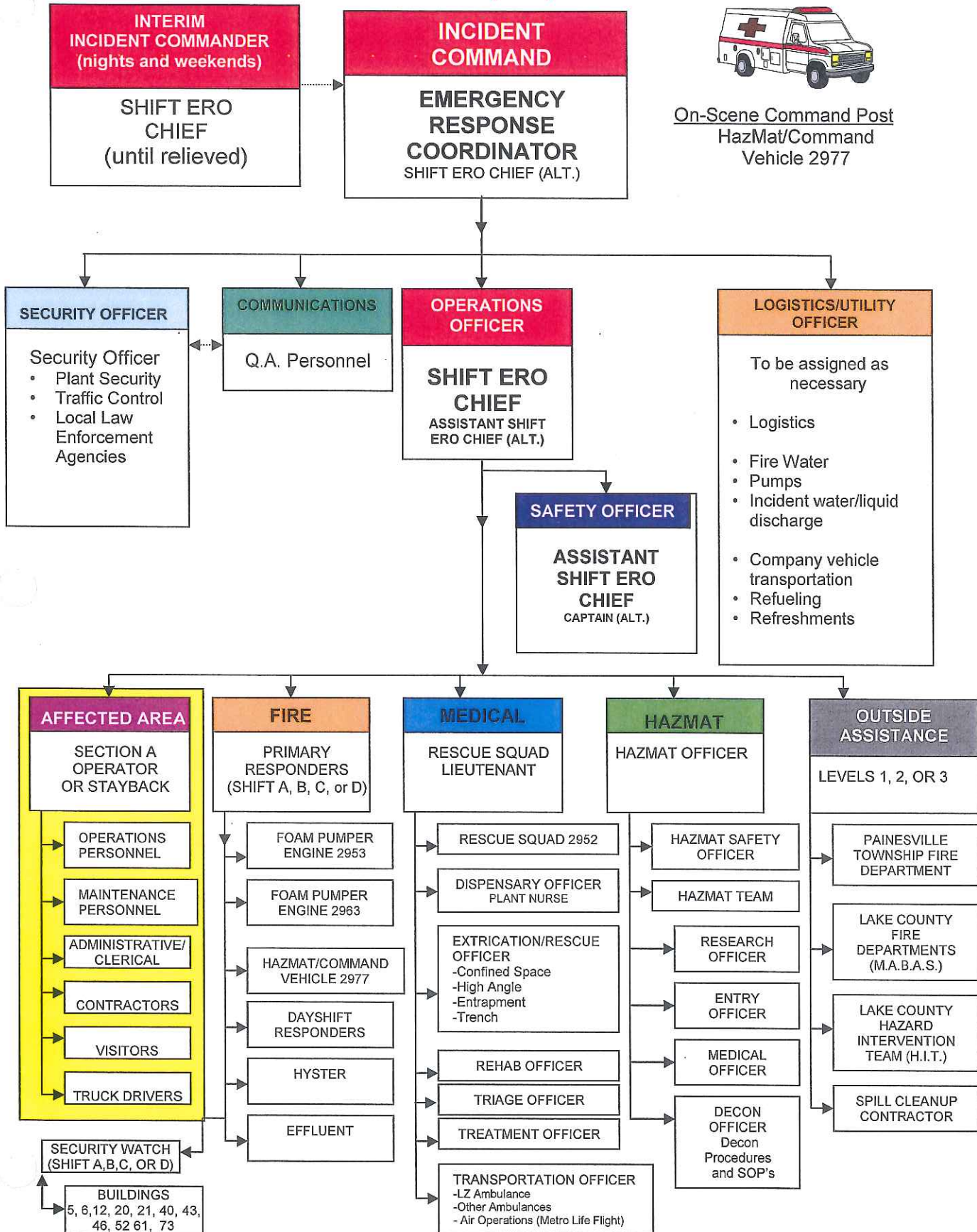


Painesville Plant

EMERGENCY RESPONSE ORGANIZATION (ERO)



On-Scene Command Post
HazMat/Command
Vehicle 2977



LEVEL 2 OR 3 ORGANIZATION



**FIRE
EXPLOSION**



**RELEASE
SPILL**



MEDICAL/RESCUE

LEVEL 1 EMERGENCY

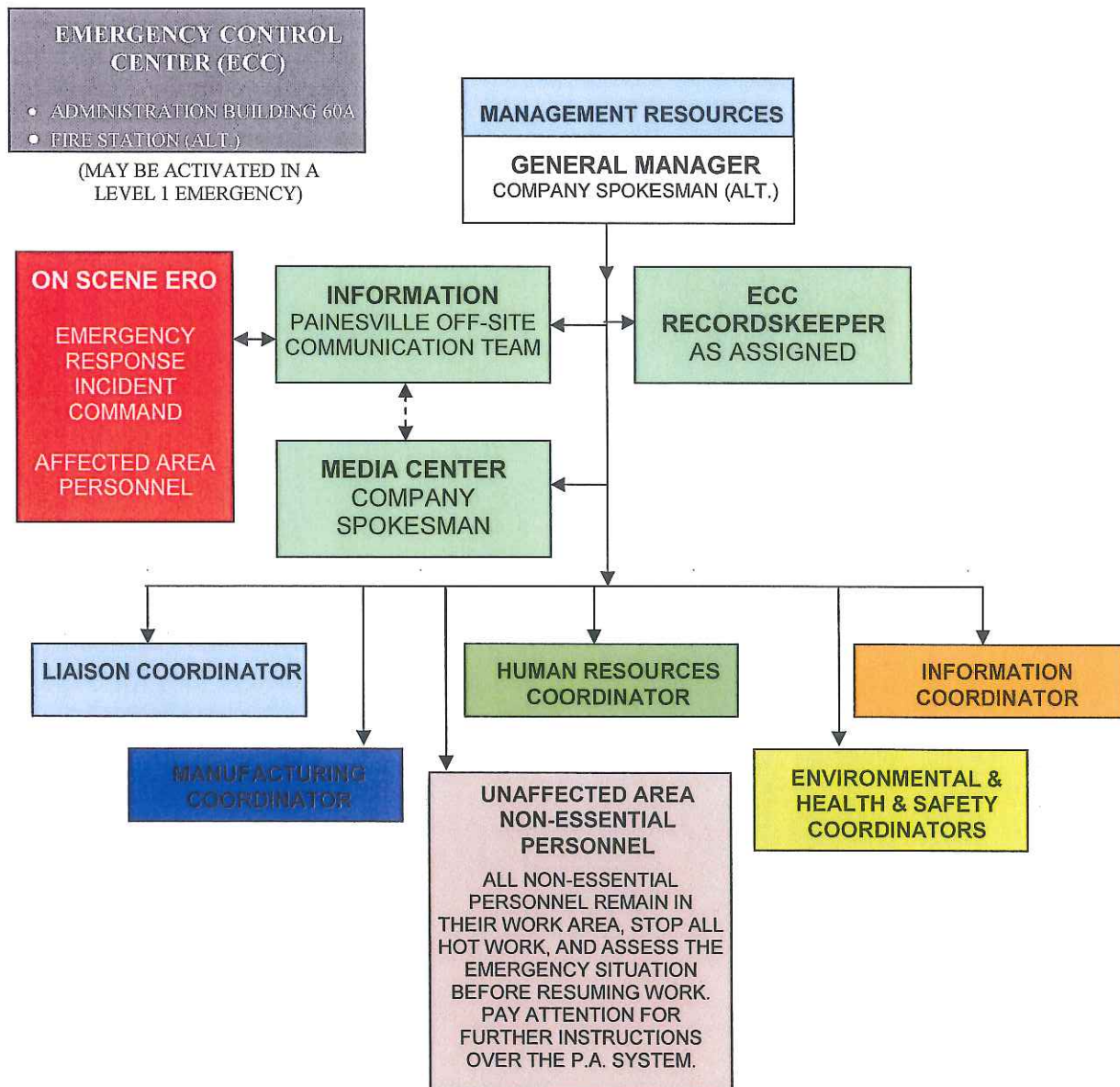
- Initial description for any incident

LEVEL 2 EMERGENCY

- Incident which MAY affect outside areas and MAY require outside assistance

LEVEL 3 EMERGENCY

- Incident which WILL affect outside areas and/or WILL require outside assistance



Lubrizol
Painesville Plant



EVACUATION AND SHELTER IN PLACE

EVACUATION

EVACUATION ASSEMBLY AREAS

- Evacuation Assembly Points are defined as safe locations to assemble or re-assemble personnel not involved with the emergency response effort in the affected area(s).
- The Incident commander or Shift ERO Chief will select one of the Evacuation Assembly Points and have the location announced over the plant's P.A. system.
- The Evacuation Assembly Points are designated by geographical locations as described in the Emergency Response Plan and as shown on Page 1.

EVACUATION GUIDELINES

1. When notified, evacuate by a safe route from the Affected Area to the Evacuation Assembly Point as instructed over the P.A.
2. IMPORTANT – Be accounted for at the Evacuation Assembly Point by your supervisor or alternate.
3. Unaccounted personnel will be reported to the Manufacturing Manager at the ECC or to the Incident Commander if the ECC has not been activated.
4. If the decision is made to relocate from the Evacuation Assembly Point, the Incident Commander will determine a safe route and have it announced over the P.A. system.

SHELTER IN PLACE ONLY IF IT IS NOT POSSIBLE TO EVACUATE SAFELY.

SHELTERING IN PLACE

SHELTERING AREAS

- Sheltering In Place is defined as any office, control room, or other areas that can be used as a temporary shelter in an affected area.

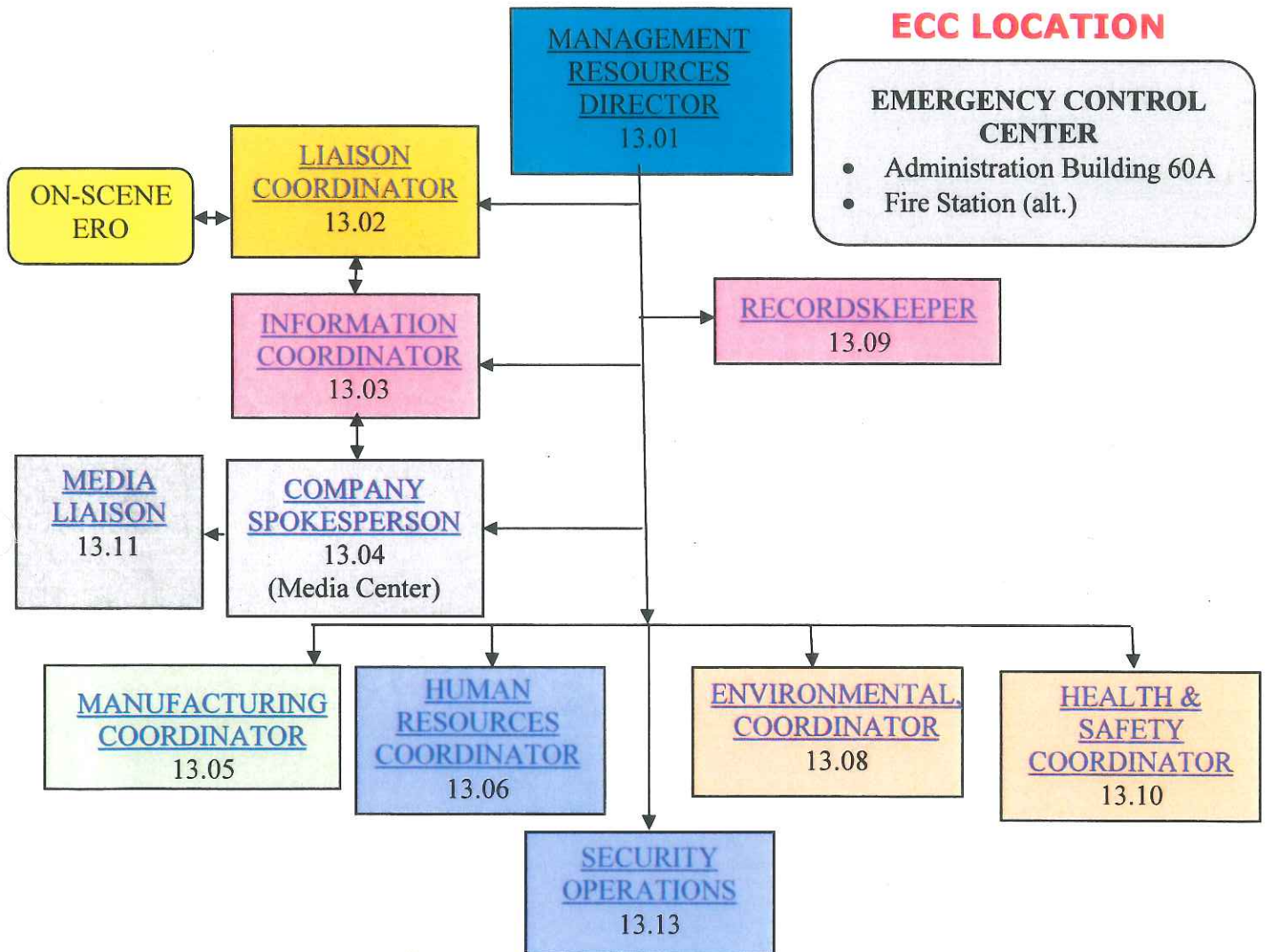
SHELTERING GUIDELINES

1. Shelter in Place only if it not possible to evacuate safely.
2. Seal the temporary shelter by closing all doors and windows.
3. Shut off the HVAC/Pressurization system(s) to prevent contamination of breathing air.
4. If you have sheltered, report your location to Security by Dialing 3718, or communicate using the Fire/Security frequency on the plant radio system.
5. Place wet towels at the base of the doors and/or any other open gaps, and at your option over the nose & mouth for temporary emergency respiratory protection, or use your personal respirator.

LEVEL 2 OR 3 ECC CHECKLIST

ECC INDEX

EACH BLOCK IS AN ACTIVE LINK TO THE PAGE CONTAINING INSTRUCTIONS FOR THAT POSITION. HOLD DOWN CONTROL KEY (Ctrl) AND CLICK WITH MOUSE TO FOLLOW THE LINK. PAGE NUMBER IS ALSO LISTED BELOW TITLE.



MANAGEMENT RESOURCES DIRECTOR

RESPONSIBILITIES:

You provide detailed knowledge and advice on current operations, equipment, systems, building layouts, process technology and chemical information.

ACTIVATION PROCEDURES:

1. You will be notified that an emergency situation exists. Obtain a brief description of the incident from security. Report to the ECC. **If you are the first person in the ECC room, you will become the *Management Resources Director* until relieved and will access and follow the packet/binder marked "Management Resources Director". You will then activate the "Painesville ECC Teleconference" number: *9-1-866-528-2256 (you must access an outside line with "**9" then the number) / Access Code is 732205, Host code is 379653 via the Polycom on speaker phone.**
2. Pull out the packet/binder marked "Manufacturing Group". Place your magnetic name tag on the sign in board.
3. Establish contact with the Liaison Coordinator.
4. Maintain a log of all major actions, activities and decisions on the "Incident Log, Form A", in your packet.

OPERATIONAL PROCEDURES:

Note: Many steps listed describe ongoing actions. Repeatedly review this entire procedure during response.

1. Based on request from Incident Commander (IC), ensure that adequate staffing levels exist for the ERO, the affected area, and the unaffected area(s). Off-shift personnel may need to be called in.
2. Inform the Management Resources Director and Information Coordinator of the nature and extent of the emergency as it affects production.
3. Act in an advisory capacity to the Incident Commander, if requested.
4. Provide MSDS to the IC and ECC staff, as needed.
5. If the company spokesperson needs a MSDS for the media, print off a confidential copy to distribute
6. If unit/area evacuation has occurred, ensure that evacuation(s) has been accomplished and all personnel are accounted for.
7. After the emergency all-clear declaration, coordinate orderly transition from the emergency condition back to normal operating conditions.
 - a. Meet with affected area personnel to determine the operability of the affected sections or units.
 - b. Review and approve a plan for the safe start-up and resumption of operations.
 - c. Check status board periodically for updates.
8. If you need to leave the facility for any reason, inform the Management Resource Director and designate someone to act in your place and sign out by moving the magnetic marker to "out".

DEACTIVATION PROCEDURES:

1. At the direction of the Management Resources Director, commence the deactivation of your area.
2. Close out all phone contacts.
3. Disassemble your work area.
4. Attend the critique and use your Incident Log forms to help critique the incident.
5. Collect all paperwork generated during the emergency and forward it to the Painesville Health & Safety Supervisor.

ECC CHECKLIST



LIAISON COORDINATOR

RESPONSIBILITIES:

You monitor the radio traffic/ report to scene to be the liaison between the Incident Commander(IC) and Security, assist in gathering event data, conditions, status and requests from the IC and provide that information to the Information Coordinator.

ACTIVATION PROCEDURES:

1. You will be notified that an emergency situation exists. Obtain a brief description of the incident from security. Report to the ECC. If you are the first person in the ECC room, you will become the Management Resources Director until relieved and will access and follow the packet/binder marked "Management Resources Director". You will then activate the "Painesville ECC Teleconference" number: *9-1-866-528-2256 (you must access an outside line with "**9" then the number) / Access Code is 732205, Host code is 379653 via the Polycom on speaker phone.
2. Pull out the packet/binder marked "Liaison Coordinator". Place your magnetic name tag on the sign in board.
3. Meet with the Information coordinator. Set up your operations in the ECC.
4. Appoint someone to go to the scene to radio information back to the liaison coordinator at the ECC.

OPERATIONAL PROCEDURES:

Note: Many steps listed describe ongoing actions. Repeatedly review this entire procedure during response.

1. Contact the on-scene IC (either directly on the plant radio system or via Security) to let him know that you are at the ECC and will be sending someone to the scene to help obtain information to radio back to the ECC.
2. Aggressively gather information from the appointed on scene liaison coordinator and continually update the Liaison coordinator at the ECC.

Note: Not all information that you receive should necessarily be immediate public knowledge: verify with the Management Resources Director on issues such as releasing the name of a fatality; unconfirmed information; speculation on the causes or consequences on an accident; comments on the response of non-Lubrizol agencies.

3. Maintain a log of all major actions, activities, and decisions. Incident Log, Form A" in your packet.
4. Relay the information from the scene to the ECC Recordskeeper for updating the white board.
5. Consider listening to the Lake County scanner for information regarding this incident.
6. If you need to leave the facility for any reason, inform the Management Resource Director and designate someone to act in your place and sign out by moving the magnetic marker to "out".

DEACTIVATION PROCEDURES:

1. At the direction of the Management Resources Director, commence the deactivation of your area.
2. Close out all phone contacts.
3. Disassemble your work area.
4. Remain ready for further instructions until dismissed.
5. Attend the critique and use your Incident Log forms to help critique the incident.
6. Collect all paperwork generated during the emergency and forward it to the Painesville Health & Safety Supervisor.

ECC CHECKLIST



INFORMATION COORDINATOR

RESPONSIBILITIES:

The Information Coordinator consists of one or more of the Company Spokespersons not assigned as the Management Resources Director. You will provide accurate and timely incident information to the Emergency Control Center (ECC) and the Media Center (MC).

ACTIVATION PROCEDURES:

1. You will be notified that an emergency situation exists. Obtain a brief description of the incident from security. Report to the ECC. **If you are the first person in the ECC room, you will become the *Management Resources Director* until relieved and will access and follow the packet/binder marked "Management Resources Director". You will then activate the "Painesville ECC Teleconference" number: *9-1-866-528-2256 (you must access an outside line with "**9" then the number) / Access Code is 732205, Host code is 379653 via the Polycom on speaker phone.**
2. Pull out the packet/binder marked "Information Coordinator". Place your magnetic name tag on the sign in board.
3. Review information received from the Liaison Coordinator (event data, conditions, status, and response activities) on the whiteboard.
4. When time permits select an aide to assist with your assigned functions and responsibilities.

OPERATIONAL PROCEDURES:

Note: Many steps listed describe ongoing actions. Repeatedly review this entire procedure during response.

1. Maintain a log of all major actions, activities, and decisions. Use the "Incident Log, Form A" in your ECC packet.
2. Turn TV on in ECC room for pertinent news coverage and for current weather radar.
3. Prepare news releases. Promptly forward the news releases to the Company Spokesperson at the MC.
4. Using the computer in the ECC, develop a News Release (see attached example) based on the information at hand, review it with appropriate ECC staff members and send it to the Company Spokesperson to update the media.
5. Verify with the Human Resources Coordinator that injured employee families have been notified before releasing names to the media.
6. Keep the ECC staff apprised of media actions, coverage and response.
7. Review in your packet- "What the Press Will Ask During an Emergency".
8. Maintain copies of all Emergency Information forms generated during the emergency.
9. If you need to leave the facility for any reason, inform the Management Resource Director and designate someone to act in your place and sign out by moving the magnetic marker to "out".

DEACTIVATION PROCEDURES:

1. At the direction of the Management Resources Director, commence the deactivation of your area. Notify the Company Spokesperson at the MC regarding de-activation. Also notify Liaison Coordinator.
2. Close out all phone contacts.
3. Disassemble your work area.
4. Attend the critique and use your Incident Log forms to help critique the incident.
5. Collect all paperwork generated during the emergency and forward it to the Painesville Health & Safety Supervisor.

ECC CHECKLIST



COMPANY SPOKESPERSON

RESPONSIBILITIES:

You are responsible for reporting emergency information and company response to the news media. You receive periodic updates from the Information Center and utilize this information to keep the media advised of the current situation.

ACTIVATION PROCEDURES:

1. You will be notified that an emergency situation exists. Obtain a brief description of the incident from security. Report to the ECC. **If you are the first person in the ECC room, you will become the Management Resources Director until relieved and will access and follow the packet/binder marked "Management Resources Director". You will then activate the "Painesville ECC Teleconference" number: *9-1-866-528-2256 (you must access an outside line with "*9" then the number) / Access Code is 732205, Host code is 379653 via the Polycom on speaker phone.**
2. Pull out the packet/binder marked "Company Spokesperson". Place your magnetic name tag on the sign in board.
3. Upon arrival at the ECC, you have been assigned the responsibility of the Company Spokesperson by the Management Resources Director. The Media Center is located across the street in the Training Building. Set up your operations in the west office in this location.
4. Request from the Management Resources Director an Aide to assist you.
5. If no media representatives respond to the facility, then in conjunction with the Information Coordinator, proactively prepare News Releases and fax them to the News Media, as appropriate.

MEDIA BRIEFING NOTES:

Note: Determine a time schedule for the news media briefings e.g., every 15 minutes, 30 minutes, but never any longer than 30 minutes apart.

1. When preparing for a scheduled briefing:
 - a. Review "Media Briefing Do's and Don'ts" and "What the Press Will Ask during An Emergency" in your packet.
 - b. Contact the Information Coordinator for the latest information concerning the situation. Confirm any information you are going to share with the media.
 - c. Request your Aide to distribute Information packets to those present.
2. Conduct the briefing in the Media Center room.

As Company Spokesperson, you should:

- a. Serve as the principal Lubrizol Spokesperson.
 - b. Review the News Releases, then conduct a question and answer session. (Remember, hold to a time frame for the question and answer session. If there are many more questions, state that you will take two more, then end the session).
 - c. Have your Aide record questions that you were not able to answer.
 - d. Acknowledge injuries and fatalities but DO NOT release names until cleared by the ECC Human Resources Coordinator, and verify that relatives have been notified.
 - e. Conclude with the time of the next briefing.
3. Following the briefing, receive copies of any unanswered questions from your Aide, obtain the answer(s) and present this information at the next briefing.

DEACTIVATION PROCEDURES:

1. At the direction of the Management Resources Director, commence the deactivation of your area.
2. Close out all phone contacts.
3. Disassemble your work area.
4. Attend the critique and use your Incident Log forms to help critique the incident.
5. Collect all paperwork generated during the emergency and forward it to the Painesville Health & Safety Supervisor.

ECC CHECKLIST



MANUFACTURING COORDINATOR

RESPONSIBILITIES:

You provide detailed knowledge and advice on current operations, equipment, systems, building layouts, process technology and chemical information.

ACTIVATION PROCEDURES:

1. You will be notified that an emergency situation exists. Obtain a brief description of the incident from security. Report to the ECC. If you are the first person in the ECC room, you will become the Management Resources Director until relieved and will access and follow the packet/binder marked "Management Resources Director". You will then activate the "Painesville ECC Teleconference" number: *9-1-866-528-2256 (you must access an outside line with "*9" then the number) / Access Code is 732205, Host code is 379653 via the Polycom on speaker phone.
2. Pull out the packet/binder marked "Manufacturing Group". Place your magnetic name tag on the sign in board.
8. Establish contact with the Liaison Coordinator.
9. Maintain a log of all major actions, activities and decisions on the "Incident Log, Form A", in your packet.

OPERATIONAL PROCEDURES:

Note: Many steps listed describe ongoing actions. Repeatedly review this entire procedure during response.

1. Based on request from Incident Commander (IC), ensure that adequate staffing levels exist for the ERO, the affected area, and the unaffected area(s). Off-shift personnel may need to be called in.
2. Inform the Management Resources Director and Information Coordinator of the nature and extent of the emergency as it affects production.
5. Act in an advisory capacity to the Incident Commander, if requested.
6. Provide MSDS to the IC and ECC staff, as needed.
10. If the company spokesperson needs a MSDS for the media, print off a confidential copy to distribute
11. If unit/area evacuation has occurred, ensure that evacuation(s) has been accomplished and all personnel are accounted for.
12. After the emergency all-clear declaration, coordinate orderly transition from the emergency condition back to normal operating conditions.
 - a. Meet with affected area personnel to determine the operability of the affected sections or units.
 - b. Review and approve a plan for the safe start-up and resumption of operations.
 - c. Check status board periodically for updates.
8. If you need to leave the facility for any reason, inform the Management Resource Director and designate someone to act in your place and sign out by moving the magnetic marker to "out".

DEACTIVATION PROCEDURES:

1. At the direction of the Management Resources Director, commence the deactivation of your area.
2. Close out all phone contacts.
3. Disassemble your work area.
4. Attend the critique and use your Incident Log forms to help critique the incident.
5. Collect all paperwork generated during the emergency and forward it to the Painesville Health & Safety Supervisor.

ECC CHECKLIST



HUMAN RESOURCES COORDINATOR

RESPONSIBILITIES:

Coordinate information needed to keep employee's families informed. Additionally, you provide medical services coordination by relaying information from the dispensary, the plant nurse, employee communications relief staff, and the corporate Medical Director to the ECC.

ACTIVATION PROCEDURES:

1. You will be notified that an emergency situation exists. Obtain a brief description of the incident from security. Report to the ECC. If you are the first person in the ECC room, you will become the Management Resources Director until relieved and will access and follow the packet/binder marked "Management Resources Director". You will then activate the "Painesville ECC Teleconference" number: *9-1-866-528-2256 (you must access an outside line with "*9" then the number) / Access Code is 732205, Host code is 379653 via the Polycom on speaker phone.
2. Pull out the packet/binder marked "Human Resources Coordinator". Place your magnetic name tag on the sign in board.
3. Set up your operations in the ECC. If additional support staff is needed, have a member of the ECC assist.

OPERATIONAL PROCEDURES:

Note: Many steps listed describe ongoing actions. Repeatedly review this entire procedure during response.

1. Maintain communications with the dispensary to determine if anyone has been injured and/or transported to a hospital.
2. Maintain a log of all major actions, activities, and decisions. Use the "Incident Log Form A" in your packet.
3. When someone is sent to a hospital, do the following:
 - a. Contact our Medical Department, or have the Liaison Coordinator contact the Medical Officer at the scene to ascertain which hospital(s) individuals are being transported. If outside squads are called in to help transport, call Central Dispatch to find out which hospital (s) individuals are being transported.
 - b. Send a Lubrizol representative to the hospital(s) to keep updated on the status and to render assistance as needed to the individual(s) and family. Instruct that person to maintain contact with you with any updated information.
 - c. Determine if the injured individual(s) family has been notified. If families have not been notified, do so. (Note: hospitals will notify families of fatalities. Have the Lubrizol representative at the hospital(s) verify this has been done.)
 - d. If needed, secure transportation for the injured employee's spouse/family or help getting someone to care for the children while the spouse goes to the hospital.
 - e. Keep the ECC Management Resources Director informed of the situation.
4. Occasionally scan the status board(s); note any corrections that need to be made. Announce the corrections to the ECC staff member present.
5. When appropriate, communicate emergency-related information to facility employees via:
 - a. Voice mail
 - b. cc: mail
 - c. Bulletin Boards

Note: Use approved news statements as the basis for employee communications.

ECC CHECKLIST



Human Resource Coordinator continued...

6. If Lubrizol family members arrive at the facility, consider the following:
 - a. Security can be instructed to tell them to go home and wait for information;
 - b. You or a designee can meet with them to offer information and assistance;
 - c. Set up an area where families may wait for news/updates, as appropriate. (Preferably, locate this area away from the Media Center). Assign a staff person as security over the area, provide updates and information as available.
7. If concerned citizens arrive at the facility, have security contact the ECC and advise the Management Resources Director of the situation.
8. Periodically, update the Corporate Human Resource Manager about the situation.
9. If you need to leave the facility for any reason, inform the Management Resource Director and designate someone to act in your place and sign out by moving the magnetic marker to "out".
10. If prolonged ECC operation is required, make the following arrangements:
 - a. Develop a relief roster for the Emergency Response volunteers and the ECC Staff members, the list to be coordinated with the Manufacturing Coordinator,
 - b. Upon roster approval from the Management Resources Director, notify the relief staff to report to the ECC at a designated time.
 - c. Notify Security about your actions and the time of staff change.
 - d. Make arrangements for food for all emergency staff and responders.
 - e. If necessary make arrangements for nearby hotel accommodations.

DEACTIVATION PROCEDURES:

1. At the direction of the Management Resources Director, commence the deactivation of your area.
2. Close out all phone contacts.
3. Disassemble your work area.
4. Remain ready for further instructions until dismissed.
5. Attend the critique and use your Incident Log forms to help critique the incident.
6. Collect all paperwork generated during the emergency and forward it to the Painesville Health & Safety Supervisor.

ECC CHECKLIST



ENVIRONMENTAL COORDINATOR

RESPONSIBILITIES:

You provide environmental information to the ECC and Incident Commander (IC) regarding environmental effects of the emergency. This includes assessing the emergency for impact on the environment and environmental compliance by gathering and analyzing necessary data, making any necessary agency notifications and advising ECC on protective actions.

ACTIVATION PROCEDURES:

1. You will be notified that an emergency situation exists. Obtain a brief description of the incident from security. Report to the ECC. If you are the first person in the ECC room, you will become the *Management Resources Director* until relieved and will access and follow the packet/binder marked "Management Resources Director". You will then activate the "Painesville ECC Teleconference" number: *9-1-866-528-2256 (you must access an outside line with "**9" then the number) / Access Code is 732205, Host code is 379653 via the Polycom on speaker phone.
2. Pull out the packet/binder marked "Environmental Coordinator". Place your magnetic name tag on the sign in board.

OPERATIONAL PROCEDURES:

Note: Many steps listed describe ongoing actions. Repeatedly review this entire procedure during response.

1. Maintain a log of events and actions taken by Environmental at the ECC on Form "A"..
2. Monitor and assess the situation; provide the IC with information concerning chemicals/materials involved.
3. If the IC has not already done so, notify federal, state, local and other regulatory agencies, as appropriate for the type of incident.
4. Inform and continuously apprise the Management Resources Director, the ECC and the IC of contacts made with the regulatory agencies.
5. Provide interface with regulatory agencies and/or representatives throughout the emergency.
6. Maintain liaison with Lubrizol's corporate legal department, as appropriate.
7. Provide guidance/assistance for the treatment and/or containment of any waste resulting from the emergency cleanup activities. Make provisions for proper disposal as required..
8. Monitor meteorological conditions from Security Weather Alert monitor in security weather station Bldg. 43 (ext. 3627); or (ext. 3810) or the Lake County EOC. Inform the Management Resources Director of any major weather changes.
9. If a release is possible, imminent or underway:
 - a. in conjunction with the IC and Health and Safety Coordinator, provide guidance in determining what monitoring may be necessary on-site and/or off-site.
 - b. provide input on whether the evacuation of any buildings/areas is advisable.
 - c. consider the guidance outlined in your packet- "Toxic Chemical Release Protective Actions".
 - d. in conjunction with the Health and Safety Coordinator, advise the Management Resource Director of any protective actions recommended.
10. Update the status board(s) with your notifications.
11. If necessary, assemble monitoring personnel to obtain air, water, or soil samples needed to assess the situation. Determine the impact and/or consequences of the sample test results.
12. Periodically scan the status board(s); note any corrections to your area of responsibility and announce them to the ECC staff.
13. If you need to leave the facility for any reason, inform the Management Resource Director and designate someone to act in your place. Move the magnetic marker to "out" by your name on the magnetic board.

DEACTIVATION PROCEDURES:

1. At the direction of the Management Resources Director, commence the deactivation of your area.
2. Close out all phone contacts.
3. Disassemble your work area.
4. Remain ready for further instructions until dismissed.
5. Attend the critique and use your Incident Log forms to help critique the incident.
6. Collect all paperwork generated during the emergency and forward it to the Painesville Health & Safety Supervisor.

ECC CHECKLIST

RECORDSKEEPER

RESPONSIBILITIES:

Maintain and update the status board(s), keep logs, make copies, fax information, answer telephones as necessary, and perform other assignments as directed by the Management Resources Director and other ECC staff members.

ACTIVATION PROCEDURES:

1. You will be notified that an emergency situation exists. Obtain a brief description of the incident from security. Report to the ECC. If you are the first person in the ECC room, you will become the Management Resources Director until relieved and will access and follow the packet/binder marked "Management Resources Director". You will then activate the "Painesville ECC Teleconference" number: *9-1-866-528-2256 (you must access an outside line with "**9" then the number) / Access Code is 732205, Host code is 379653 via the Polycom on speaker phone.
2. Pull out the packet/binder marked "ECC Records keeper". Place your magnetic name tag on the sign in board.
3. Meet with the Management Resources Director and follow instructions regarding your duties.

OPERATIONAL PROCEDURES:

1. Update status board(s) with information/assistance from:
 - a) The Management Resources Director by occasionally asking him/her to verify the information posted.
 - b) Others as they receive updates on their area of responsibilities,
2. Periodically check the ECC staffing board to ensure it reflects current staffing status.
3. Collect the original or a copy of all documents generated after the incident has been mitigated and/or the ECC has been deactivated.
4. Make photocopies, send fax's and perform other duties as assigned.
5. Answer telephone calls when directed, answer unattended phones, record information given out with dates and times.
6. If you need to leave the facility for any reason, inform the Management Resource Director and designate someone to act in your place and sign out by moving the magnetic marker to "out".

DEACTIVATION PROCEDURES:

1. At the direction of the Management Resources Director, commence the deactivation of your area.
2. Collect all paperwork generated during the emergency and forward it to the Painesville Health & Safety Supervisor.
3. Close out all phone contacts.
4. Disassemble your work area.
5. Remain ready for further instructions until dismissed.
6. Attend the critique and use your Incident Log forms to help critique the incident.

ECC CHECKLIST

HEALTH & SAFETY COORDINATOR

RESPONSIBILITIES:

You provide health & safety expertise to the ECC and Incident Commander (IC) regarding overall impact and health effects of the emergency. This includes assessing the effects of the chemicals/materials of concern and advising the ECC on protective actions. You provide medical services coordination by relating information to and from the medical department/personnel. Ensure communications and documentation of emergency information to federal, state & local regulatory agencies as appropriate.

ACTIVATION PROCEDURES:

1. You will be notified that an emergency situation exists. Obtain a brief description of the incident from security. Report to the ECC. If you are the first person in the ECC room, you will become the Management Resources Director until relieved and will access and follow the packet/binder marked "Management Resources Director". You will then activate the "Painesville ECC Teleconference" number: *9-1-866-528-2256 (you must access an outside line with "*9" then the number) / Access Code is 732205, Host code is 379653 via the Polycom on speaker phone.
2. Pull out the packet/binder marked "Health & Safety Coordinator" and set up your work area. Place your magnetic name tag on the sign in board.

OPERATIONAL PROCEDURES:

Note: Many steps listed describe ongoing actions. Repeatedly review this entire procedure during response.

1. Activate the camera system on the computer using the Infocus to project the image on the screen for the Coordinators to see. The username for the computer is PVEHSECC1, password is kaNpoM8. The bold numbers are uppercase. Call Security at 3810 to have them focus the main camera on the incident, if the incident is in range.
2. Maintain a log of events and actions taken by Health & Safety at the ECC on Form "A" in your packet.
3. Monitor and assess the situation; provide the IC with information concerning chemicals/materials involved.
4. If the IC has not already done so, notify federal, state, local and other regulatory agencies, as appropriate for the type of incident.
5. Inform and continuously apprise the Management Resources Director, the ECC and the IC of contacts made with the regulatory agencies.
6. Provide interface with regulatory agencies and/or representatives throughout the emergency.
7. Consult with medical personnel regarding the treatment of individuals exposed to chemicals. Advise the ECC about actual or potential health effects of any chemicals or materials involved in the emergency. Keep ECC informed of medical department/personnel actions.
8. Assist Human Resource Coordinator with medical notifications and follow-ups with care providers.
9. If a release is possible, imminent or underway:
 - a. in conjunction with the IC and Environmental Coordinator, provide guidance in determining what monitoring may be necessary on-site and/or off-site.
 - b. provide input on whether the evacuation of any buildings/areas is advisable. Inform the IC and have him/her initiate evacuation procedures, if deemed appropriate.
 - c. consider the guidance outlined in your packet – "Toxic Chemical Release Protective Actions".
 - d. advise the Management Resource Director of any protective actions recommended
10. Update the status board(s) with your notifications.
11. Periodically scan the status board(s); note any corrections to your area of responsibility and announce them to the ECC staff.
12. Periodically update the Corporate Director of Safety throughout the emergency as necessary.
13. If you need to leave the facility for any reason, inform the Management Resource Director and designate someone to act in your place. Move the magnetic marker to "out" by your name on the magnetic board.

DEACTIVATION PROCEDURES:

1. At the direction of the Management Resources Director, commence the deactivation of your area.
2. Close out all phone contacts.
3. Disassemble your work area.
4. Remain ready for further instructions until dismissed.
5. Attend the critique and use your Incident Log forms to help critique the incident.
6. Collect all paperwork generated during the emergency and forward it to the Painesville Health & Safety Supervisor.

MEDIA LIAISON**RESPONSIBILITIES:**

As Media Liaison, you interact with the media at the MOC, answer logistical questions, orient and brief new arrivals, work directly with the set-up and audio-visual staff, and report media numbers, special media requests and unanswered briefing questions to the Company Spokesperson. You also serve as a moderator for news briefings.

ACTIVATION PROCEDURE:

1. You are notified that the ECC has been activated.
2. Report to the Emergency Control Center (ECC) until media arrives or their arrival is expected. The Management Resources Director may need to assign additional staffing to assist (strive for a minimum of three Media Liaisons to assist).
3. Report immediately to the designated Media Operations Center and help set up the facility. You may be asked to meet with the news media that have arrived at the facility, escort them to the MOC and provide them with preliminary information. If this is the case, gather as much information about the incident before meeting the media. *Note: The primary MOC (in the LEO Credit Union building) is locked at all times. See Security for a key to the building and MOC offices.*
4. Sign in on the staff board in the MOC.
5. Set up your work area at the MOC as follows:
 - a. Open your packet and set up your work area.
 - b. Test all phones, faxes and computers.
6. Report to the Emergency Control Center that the MOC is operational and that you are ready to assume your responsibilities.

OPERATIONAL PROCEDURE:

NOTE: Many steps listed describe ongoing actions. Repeatedly review entire procedure during response.

1. Ensure the Media Briefing Area remains a controlled environment, and inform the Company Spokesperson of any difficulties or adverse situations.
2. Ensure press kits are available for the media.
3. Ensure all News Statements are posted in chronological order in the Media Briefing Area and that enough copies of each are available for them media.
4. Maintain a log of major events, decisions and phone calls using the Incident Log. Maintain copies of all news statements issued and communications received from the ECC.
5. Inform the news media that you and MOC staff members are available to answer logistical questions, orient them to the facility, accommodate their camera/lights and other recording equipment, etc.
6. Assist the news media in obtaining information and forward special requests for information, interviews, and tours to the Company Spokesperson.
7. If a media tour is to be conducted, coordinate media participants with the Incident Commander/Assistant Fire Chief.
8. Announce news-briefing times and post the time in the Media Briefing Area.
9. Attend pre-briefing meetings in the MOC to inform Spokesperson of media questions and concerns.
10. Ensure all questions unanswered by the Spokesperson are written down and provided to the Spokesperson after the briefing for follow-up.
11. Request extra staff if necessary to run the MOC effectively.
12. Obtain news statements from the Emergency Control Center for distribution in the Media Briefing Area. Distribute them to the reporters and media crews in the briefing room.
13. If serving as the moderator during media briefings:
 - a. Moderate briefings including question and answer sessions.
 - b. Explain how briefings will be conducted.
 - c. Briefly point out press kit contents.
 - d. Introduce the Lubrizol spokesperson, technical advisor and yourself.
 - e. Record all unanswered questions.
 - f. Conclude by announcing the time of the next briefing.

ECC CHECKLIST



Media Liaison continued ...

DEACTIVATION PROCEDURE:

1. When the Company Spokesperson calls for the deactivation of the MOC, supervise the deactivation in the MOC.
2. Collect all paperwork generated during the emergency and forward it to the Support Staff.
3. When the Media Work Area is disassembled and returned to pre-emergency status, notify the Emergency Control Center and the Company Spokesperson.
4. Disassemble your work area and packet and replenish your supplies from those of the Support Staff.
5. Remain ready for further instructions until dismissed.

SECURITY OPERATIONS

RESPONSIBILITIES:

You provide Security expertise and communications to the ECC and Incident Commander (IC) regarding security operations during an emergency. You are responsible to take direction from the ECC personnel and the IC and to assist as needed. Ensure communications and documentation of the emergency information as appropriate.

ACTIVATION PROCEDURES:

1. You will be notified that an emergency situation exists. Obtain a brief description of the incident from the IC or another member of the SMT
2. Ensure accurate documentation during the emergency. Follow instructions given by the IC.

OPERATIONAL PROCEDURES:

Note: Many steps listed describe ongoing actions. Repeatedly review this entire procedure during response.

1. Activate the camera system on the monitor to view the emergency, if visible. Contact the Health and Safety Coordinator at the ECC to let him know the camera system is up and running. Focus the main camera on the incident, if the incident is in range.
2. Maintain a log of events and actions taken during the emergency on Form "A".
3. Obtain the level of the emergency from the IC and post sign in window.
4. Close the main employee parking lot gate until told to reopen. Contact the truck gate security to stop all inbound traffic until notified to resume normal operations.
5. Lock the inner security office door to keep the media and others in the vestibule. Turn down the volume on the radio just enough that you can hear the radio traffic but not loud enough that the media and others can hear it from the vestibule.
6. Inform and continuously apprise the Management Resources Director, the ECC and the IC if and when the media shows up. Do not discuss Lubrizol or the emergency with the media.
7. The Media Liaison will come out to escort the media to the Media Operation Center.
8. Call the QA Laboratory to have someone(s) come out to assist you. Assign them tasks that will allow you to focus on security issues.
9. Monitor radio traffic during the emergency.
10. Periodically update the Health and Safety Coordinator throughout the emergency as necessary.

DEACTIVATION PROCEDURES:

1. At the direction of the Management Resources Director, commence the deactivation of your area.
2. Disassemble your work area.
3. Remain ready for further instructions until dismissed.
4. Attend the critique and use your Incident Log forms to help critique the incident.
5. Collect all paperwork generated during the emergency and forward it to the Painesville Health & Safety Supervisor.

EMERGENCY OUTSIDE CONTACTS

Lubrizol

Painesville Plant

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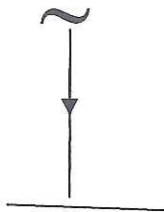


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EMERGENCY OUTSIDE CONTACTS

Lubrizol

Painesville Plant



LOCAL AGENCIES

LAKE COUNTY GENERAL HEALTH DIST. Phone: (440) 350-2543

OSHA (CLEVELAND OFFICE)	Phone: (216) 522-3818
LAKE COUNTY EMERGENCY MANAGEMENT AGENCY	Phone: (440) 350-5368
COAST GUARD (FAIRPORT OFFICE)	Phone: (440) 352-3111
COAST GUARD (CLEVELAND OFFICE)	Phone: (216) 902-6000
COAST GUARD (CLEVELAND MARINE SAFETY OFFICE)	Phone: (216)-937-0111
LAKE COUNTY ENGINEER'S OFFICE	Phone: (440) 350-2770
MENTOR MARSH BOARD OF MANAGEMENT (only contact if spill has potential to effect Mentor Marsh)	
Tom Rapini, Chair	Phone: 440-257-2673
Dr. James Bissell (Cleveland Museum of Natural History)	Phone: 216-231-4600 (W) x3219
	Phone: 440-466-8255 (H)

POLICE AND LAW ENFORCEMENT

LAKE COUNTY SHERIFF'S DEPT. Phone: (440) 953-5391
or (440) 350-5620
LAKE COUNTY CENTRAL DISPATCH Phone: (440) 354-4317

PAINESVILLE CITY POLICE	Phone: (440) 639-4863
FAIRPORT HARBOR POLICE	Phone: (440) 354-4317
GRAND RIVER POLICE	Phone: (440) 352-1287
MENTOR POLICE	Phone: (440) 255-1234
OHIO STATE HIGHWAY PATROL (CHARDON POST)	Phone: (440) 354-3233
F.B.I.	Phone: (440) 522-1400

EMERGENCY OUTSIDE CONTACTS



Painesville Plant

BOMB SQUAD

NOTIFY LAKE COUNTY SHERIFF'S DEPT. Phone: (440) 953-5391 or
(440) 350-5620

ENVIRONMENTAL SERVICES

INLAND WATERS
CLEAN HARBORS
CHEMTRON

Phone: 1-800-869-3949
Phone: (216) 881-5008
Phone: (440) 937-5950 (24 hrs.)

UTILITY SERVICES

PAINESVILLE CITY WATER
DISTRIBUTION, SERVICE & REPAIR

Phone: (440) 392-2975
Phone: (440) 392-9565 (after hours)

PAINESVILLE CITY WATER
POLLUTION CONTROL

Phone: (440) 392-6316

EAST OHIO GAS COMPANY

Phone: (800) 521-4400 (emergency - bypasses
the non-priority queue)
Phone: (216) 736-6650 (secondary)
Phone: (216) 736-6914 (non emer. leak detection)
Phone: (440) 717-5460

THE ILLUMINATING COMPANY

EPCO (Carbon Dioxide supplier)

Phone: (800) 259-8095
Request EMERGENCY delivery of Carbon Dioxide.
EPCO dispatcher has instructions to immediately
contact their supervisor and Tom Gannon (work 440-
930-4779 or cell 440-670-5574) and advise of
emergency at Lubrizol.
Dispatcher can also call Ric Wiesemann 318-537-
3371 or Darrell Craft 318-537-3370.
Truck deliveries will commence within 10 hours @
up to 3 per day.

EMERGENCY OUTSIDE CONTACTS

Lubrizol

Painesville Plant

FIRE DEPARTMENTS

PAINESVILLE TOWNSHIP FIRE DEPT. Phone: (440) 354-3513

CONCORD FIRE DEPARTMENT	Phone: (440) 354-7504
FAIRPORT FIRE DEPARTMENT	Phone: (440) 352-3620
GRAND RIVER FIRE DEPARTMENT	Phone: (440) 352-9133
MENTOR FIRE DEPARTMENT	Phone: (440) 255-1212
PAINESVILLE CITY FIRE DEPARTMENT	Phone: (440) 354-3579

AMBULANCE SERVICE

TRI-COUNTY AMBULANCE	Phone: (440) 951-4600
TRASK AMBULANCE	Phone: (440) 286-9374
COMMUNITY CARE AMBULANCE	Phone: 1-800-292-5707

LIFE FLIGHT



METRO LIFE FLIGHT
NON-EMERGENCY (800) 255-2229

**LIFE FLIGHT
OPERATIONS
(800) 233-5433**

Incident Commander shall request:

- Life Flight for a scene run giving Lubrizol's name and location.
- Life Flight to "Stand-by" for a run giving Lubrizol's name and location.
- Life Flight to meet Rescue Squad at TriPoint Medical Center E.R. giving Lubrizol's name and location.

EMERGENCY OUTSIDE CONTACTS

Lubrizol

Painesville Plant

HOSPITALS

TRIPOINT HOSPITAL	E.R. Office Phone: (440) 354-1685
	Squad Phone: (440) 354-5150
LAKE WEST HOSPITAL	E.R. Phone: (440) 946-6129
RICHMOND HEIGHTS HOSPITAL	E.R. Phone: (440) 585-6433
MERIDIA EUCLID HOSPITAL	E.R. Phone: (216) 296-8650
MERIDIA HILLCREST HOSPITAL	E.R. Phone: (440) 449-4600
GEAUGA REGIONAL HOSPITAL	Phone: (440) 946-4200
UNIVERSITY HOSPITAL	E.R. Phone: (216) 844-3835

TRAUMA & BURN

METRO HEALTH MEDICAL CENTER BURN UNIT	Phone: (216) 778-5627
HILLCREST HOSPITAL	Phone: (440) 449-4600

POISON CONTROL

Phone: (216) 231-4455

FATALITIES

LAKE COUNTY SHERIFF'S DEPT.	Phone: (440) 953-5391
or	(440) 350-5620
COUNTY CORONER	Phone: (440) 350-2789
OSHA (CLEVELAND OFFICE)	Phone: (216) 522-3818

EMERGENCY OUTSIDE CONTACTS



Painesville Plant

MEDIA

TV

CHANNEL 3	Phone: (216) 344-3300 Fax: (216) 344-3314
CHANNEL 5	Phone: (216) 431-3750 Fax: (216) 431-3666
CHANNEL 8	Phone: (216) 432-4240 Fax: (216) 391-4559
CHANNEL 19	Phone: (216) 561-1919 Fax: (216) 991-1932
CHANNEL 25	Phone: (216) 398-2800 Fax: (216) 749-2560
CHANNEL 43	Phone: (216) 843-3440 Fax: (216) 843-6397

RADIO

WBKC	Phone: (440) 352-1460 Fax: (440) 357-7701
WELW	Phone: (440) 942-9359 Fax: (440) 953-0320
WHK	Phone: (216) 781-1420 Fax: (216) 781-5258

NEWSPAPERS

NEWS HERALD	Phone: (440) 951-0000 Fax: (440) 975-2293
CLEVELAND PLAIN DEALER (LAKE COUNTY OFFICE)	Phone: (440) 974-2100 Fax: (440) 999-5028

EMERGENCY OUTSIDE CONTACTS

Lubrizol

Painesville Plant

LUBRIZOL'S INDUSTRY NEIGHBORS

DYSON & SONS, INC.	Phone: (440) 352-4421
CINTAS	Office: (440) 352-4003
FIRST BRANDS CORP	Phone: (440) 352-6176
GIBBS WIRE & STEEL CO.	Phone: (440) 352-0611
ODOT GARAGE	Phone: (440) 354-2191
SAS RUBBER INC.	Phone: (440) 352-3321
CORE SYSTEMS	Phone: (440) 392-2431
FRANZ TOWING	Phone: (440) 352-3888
LAKE SCRAP	Phone: (440) 354-9929

PIPELINES

NITROGEN SUPPLY (OSAIR INC.) Phone: (440) 255-8238
(440) 951-9633

Primary Contact: John Magnusson (440) 667-1313 (cell)
(in case of emergencies) (216) 768-5103 (pager)
(440) 358-1544 (home)

Secondary Contact: Jack Butler (440) 667-7050 (cell)
(440) 980-4683 (pager)
(440) 352-2995 (home)

Third Contact: Tim Honkala (888) 591-0221 (pager)
(440) 635-0012 (home)

CONTRACTOR EMERGENCIES / INJURIES

CONTRACTOR

ABC DRIVEWAY	Office: (440) 352-2911
AYRSHIRE INC.	Office: (440) 286-9507 Jim Mascek
ATLAS INDUSTRIAL	Office: (440) 942-7315
BENTLEY EXCAVATING	Office: (440) 352-8495*
CHAPMAN ELECTRIC	Office: (440) 354-2310 Tom Chapman Cell: (440) 221-3181
CLC	Office: (216) 741-3351 Jeff Aquino
LIBERTY CONCRETE	Office: (216) 635-0020
MID-CONTINENT CONS.	Office: (440) 439-6100
PREFERRED PAINTERS	Office: (216) 587-0957
R&D CORPORATION	Office: (440) 358-9990
RELIANCE MECHANICAL	Office: (216) 391-1030
ADECCO	Office: (440) 974-1944
VECTOR TECHNICAL	Office: (440) 946-8800

*See page 9 for additional emergency contact nos. for Bentley Excavating

EMERGENCY OUTSIDE CONTACTS

Lubrizol

Painesville Plant

SCHOOLS

BUCKEYE ELEMENTARY SCHOOL	Phone: (440) 352-2191
CHESTNUT ELEMENTARY SCHOOL	Phone: (440) 392-5350
ELM STREET ELEMENTARY	Phone: (440) 392-5520
HADDEN ELEMENTARY SCHOOL	Phone: (440) 354-4414
MAPLE ELEMENTARY SCHOOL	Phone: (440) 392-5440
MADISON AVENUE ELEM. SCHOOL	Phone: (440) 357-6171
McKINLEY ELEMENTARY SCHOOL	Phone: (440) 354-4982
MELRIDGE ELEMENTARY SCHOOL	Phone: (440) 352-3854
STERLING MORTON ELEMENTARY	Phone: (440) 257-5954
PAINESVILLE CHRISTIAN ACADEMY	Phone: (440) 352-4516
SUMMIT ACADEMY	Phone: (440) 358-0877
OUR SHEPHARD LUTHERAN ELEM.	Phone: (440) 357-7776
JOHN R. WILLIAMS JR. HIGH SCHOOL	Phone: (440) 352-3345
HERITAGE MIDDLE SCHOOL	Phone: (440) 392-5250
FAIRPORT HARDING HIGH SCHOOL	Phone: (440) 354-3592
HARVEY HIGH SCHOOL	Phone: (440) 392-5110
RIVERSIDE HIGH SCHOOL	Phone: (440) 352-3341
LAKE ERIE COLLEGE	Phone: (440) 352-3361

RAILROADS

CSX	Phone: (800) 327-5405, ext. 4085 (440) 992-1758
CSX "Police"	Phone: (800) 232-0144 DOT designation = 523806X (CSX uses for corner of Rt. 44 and plant)
NORFOLK & SOUTHERN	Phone: (800) 680-0400

EMERGENCY OUTSIDE CONTACTS



Painesville Plant

VENDORS

SAFETY/FIREFIGHTING SUPPLIES/FUEL

NATIONAL FOAM INC.	Phone: (610) 363-1400
SOUTHCOAST FIRE & SAFETY	Phone: (713) 649-6691
	FAX: (713) 649-6694
	Pager: (713) 648-2974
GRINNELL FIRE PROTECTION	Phone: (440) 783-0300
ABCO FIRE PROTECTION	Phone: (216) 433-7200
VALLEN SAFETY SUPPLY	Phone: (800) 364-1111 ext. 563
GENE PTACEK	Phone: (216) 651-8300
SUSQUEHANNA	Phone: (800) 494-0580
MELZERS FUEL SERVICE	Phone: (440) 354-3545
For after hours diesel fuel:	Andy: (440) 343-9365 or
	Rick: (440) 343-9362

EQUIPMENT/HEAVY EQUIPMENT

AIR TECHNOLOGIES	Phone: (440) 349-3900
AYRSHIRE:	Phone: (440) 286-9507 (office)
BENTLEY EXCAVATING	Phone: (440) 352-8495 (office)
Dennis Bentley	Home: (440) 259-3891 Cell: 477-9090
Mike Bentley	Home: (440) 259-3055 Cell: 477-7616
Ron Bentley	Home: (440) 259-3875 Cell: 477-7610
Doug Routzahn	Home: (440) 352-8495
O'CONNORS AUTO BODY & TOWING SERVICE	Phone: (440)-944-4400
(for lifting tank trucks)	(440) 585-1999
PRIME ENERGY(compressors)	Phone: (440) 926-1137
RJ CORMAN DERAILMENT SERVICES (train derailment)	Phone: (800)-772-9091 (24 hours)

ERO PERSONNEL LIST



HM/CV 2977

EMERGENCY RESPONSE COORDINATOR

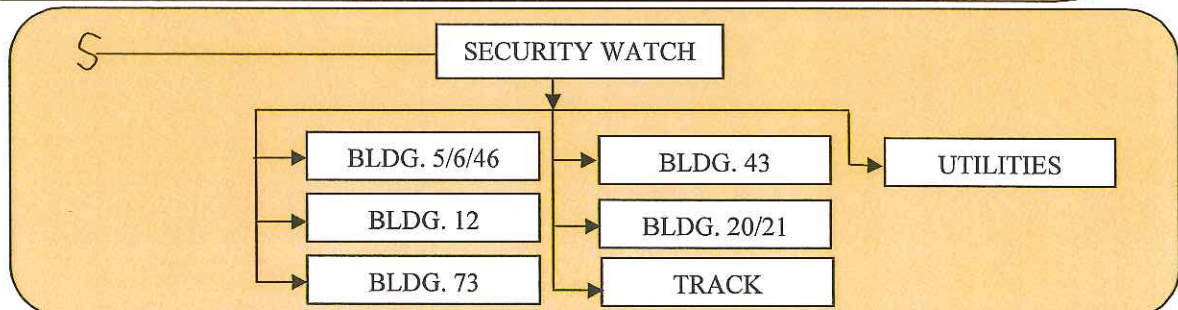
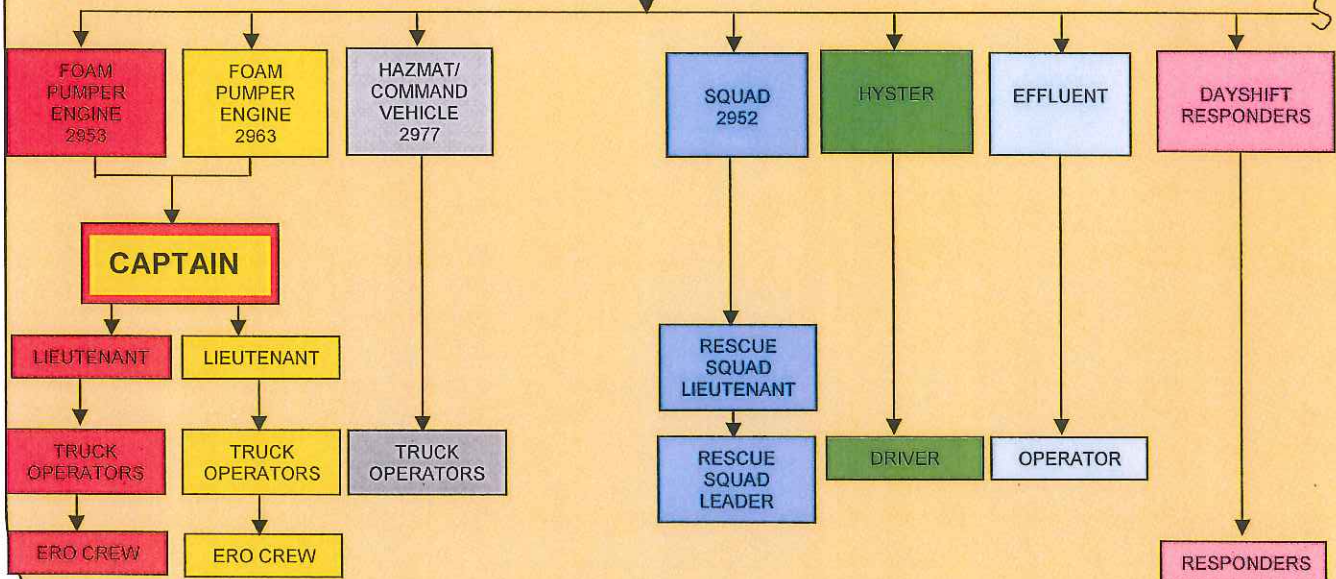
A, B, C, D SHIFTS

ERO CHIEF

ERO ASSISTANT CHIEF

PLANT
SECURITY

COMMUNICATIONS



ERO PERSONNEL LIST

Emergency Incident Notifications Call List

Please make the following emergency notifications immediately day or night via telephone, pager, or mobile. You may request that Security make the notifications in the event that you are unable. The purpose is to communicate and provide support if needed.

Medical

*Notify all individuals listed.

1. Injuries requiring a hospital transport
 1. Pat Shannon
 2. Department affected as appropriate - Joe Marcsik / Rick Bruno / Pat Splane
2. Personal illness requiring a hospital admittance
 1. Pat Shannon
 2. Department affected as appropriate - Joe Marcsik / Rick Bruno / Pat Splane

Environmental

*Someone from this group **MUST** be notified

1. Reportable Quantity (RO) evaluation and reporting
 1. Ken Frato (Primary)
 2. Gwendolyn McDay (Primary Alternate)
 3. Angelo Cicconetti (Secondary Alternate)
 4. Pat Splane, Rick Bruno & Pat Shannon (Information Only)
2. Permit Violations--Water
 1. Gwendolyn McDay (Primary)
 2. Ken Frato (Primary Alternate)
 3. Ed Zapach (Secondary Alternate)
3. Permit Violations--Air
 1. Ken Frato (Primary)
 2. Kelly Mathews (Primary Alternate)

Significant Odors

1. Ken Frato, Joe Marcsik, Pat Shannon, Craig Hupp, Rick Bruno, Pat Splane

Fire

*Notify all individuals listed

1. Any fire—regardless of size: Pat Shannon
2. Fires or explosions that cause damage or injury

1. Pat Shannon	4. Ken Frato
2. Joe Marcsik	5. Craig Hupp
3. Rick Bruno	6. Pat Splane

Other

1. Any event which has the potential to initiate media involvement

1. Craig Hupp	4. Pat Shannon
2. Joe Marcsik	5. Rick Bruno
3. Ken Frato	6. Pat Splane
2. Mutual Aid request by another Fire Department

1. Pat Shannon	4. Craig Hupp
2. Ken Frato	5. Rick Bruno
3. Joe Marcsik	6. Pat Splane

Contact Information

<u>Name</u>	<u>Home Phone</u>	<u>Pager/Cell</u>	<u>Mobile</u>
Angelo Cicconetti	440-350-1510	440-343-7175	
Rick Bruno	440-285-4535	440-343-7095	
Ken Frato	440-357-1655	440-391-1104	
Craig Hupp	440-285-1734	440-376-0879	440-567-5328
Gwendolyn McDay		440-364-4821	
Joe Marcsik	440-951-0450	440-343-7584	
Kelly Mathews	440-428-1374	440-417-2074	
Kristy Milo	440-257-7066	440-376-8881	
Pat Shannon	440-361-4122	440-343-7493	
Pat Splane	440-946-9807	440-289-0153	
Ed Zapach	440-357-6604		

Fire Station: 440-428-3056

EMERGENCY RESPONSE OFFICERS ROSTER

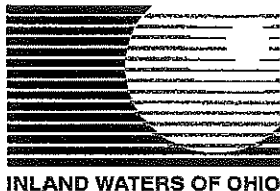
Emergency Response Coordinator

ERO
Coordinator Pat Shannon

Shift Emergency Response Officers

EH&S Coordinator	Larry Brown	Matt Sadowski	John Adamik	Mark Decker
Assistant Chief	Alex Fistek	Bill Booth	Joe Morano	Rich Reinke
Captain	Paul Nicaastro	Scott Majors	Jason Lewis / Gary Howe	Domenic Berardinelli
Lieutenant	Micah Bidwell	Gerald Fielding	Rick Javins	Nick Fairbanks
"	Gary Quigley	Dave Neuhofs	John Sullivan	Dave Guthrie

APPENDIX II



*Environmental, Industrial &
Waste Management Services*

24 Hour Emergency Response;
1-800-869-3949

216-861-3949
Fax: 216-861-3156
Email: info@inlandwaters.com
2195 Drydock Avenue
Cleveland, Ohio 44113

November 6, 2009

Mr. Curt Jerauld
Lubrizol
29400 Lakeland Blvd.
Wickliffe, Ohio 44092-2298

Re: Spill Responder

Dear Mr. Jerauld,

Thank you for your inquiry about listing Inland Waters of Ohio (IWO) as one of the Emergency Response Contractors for your Company. When acting as a spill responder for a facility or a transporter traveling over the road, specific items are needed for our files.

FACILITY REQUIREMENTS

In order to most effectively respond to an incident at your facility, please supply us with the following information if applicable:

- 1) A list of the most hazardous and largest volume of chemicals at your facility.
- 2) A copy of your contingency plan.
- 3) A facility map indicating storage/process areas and access routes.
- 4) Emergency contact person or persons.
- 5) An established billing mechanism such as a Memorandum or Understanding, Blanket Purchase Order, an Authorization to Proceed and/or a Signed Contract.

If your company is not arranging for a blanket purchase order or signed contract, please note that the enclosed "Authorization-To-Proceed" form needs to be filled in and faxed to IWO at (216) 861-3156 anytime a spill occurs and our services are utilized. IWO also accepts credit cards for payment of spills. I have also enclosed a Memorandum of Understanding. Please decide on what form of contract or payment terms you wish to use and then please put it in place so as not to hinder response time in case of a spill.

Mr. Curt Jerauld
November 6, 2009
Page 2

We respond to spill emergencies on a 24-hour basis. IWO reserves the right to delay a response to your facility due to unforeseen and/or uncontrollable circumstances (e.g. a natural disaster; an act of war; etc.). It should be noted that IWO can and has effectively responded to multiple incidents at the same time.

The Inland Waters of Ohio Emergency Response Numbers are (216) 861-3949, or toll free (800) 869-3949. Our Emergency Response Coordinator is Vince Ambers.

A file will be established for your company in which I will add all necessary information as it is forwarded to us.

Inland Waters of Ohio is also a Mobile Oil Transfer Facility approved by the US Coast Guard for any oil transfer over water.

I have enclosed our current rate schedule and some of our qualifications for spill response as well as other services we provide.

Thank you for your interest in Inland Waters of Ohio.

Sincerely,

Elaine Eden
Sr. Account Manager

INLAND WATERS OF OHIO



Inland Waters of Ohio 2008 Deployment Exercise Certification

Revised: 10/13/2009

This Certification contains a listing of personnel and equipment that was actually deployed during response actions to contain and recover spills from waterways during calendar year 2008. The purpose of this Certification is to demonstrate that Inland Waters of Ohio (IWO) met its OPA '90 requirements associated with "Drill and Exercises" by performing **actual** emergency spill response activities during this period.

Please be aware that IWO is no longer a U. S. Coast Guard approved OSRO; however, IWO still holds a "Basic Ordering Agreement" with the U.S. Coast Guard and routinely responds to oil and chemical spills on water. IWO has been performing environmental marine spill response for 37 years.

IWO responded to 114 environmental emergency response incidents with 48 of the spills being on or about navigable waterways between January 1, and December 31, 2008. The totals listed below illustrate IWO's level of effort expended to respond to the 48 waterway related spills.

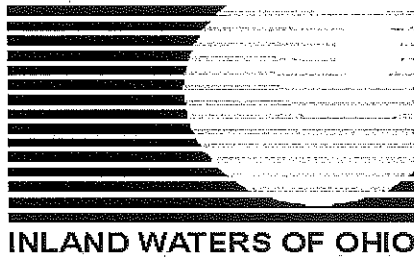
- Personnel Responses: 152 times
- Containment Boom Deployed: 9,250 feet
- Marine Vessels Sancho (54'): 8 times
- Boats (john boats and work boats): 12 times
- Trucks (vacuum): 37 times
- Trucks (roll off): 19 times
- Excavator/Backhoe: 8 times
- Loader: 2 times
- Pressure Washer: 18 times

The above response activity demonstrates that IWO's response equipment has been adequately deployed and tested in actual responses. Inland Waters of Ohio hereby certifies that the deployment exercises pursuant to the 40 CFR 112 Facility Response Plan requirements have been met. Additionally, IWO is involved in a comprehensive equipment maintenance program.

Should you have any questions or concerns, please contact me at 216-861-3949.

Sincerely,

Claude A. Kubrak
Vice President / GM



INLAND WATERS OF OHIO, INC
An IISG, LLC Company
CONFIDENTIAL FEE SCHEDULE

2195 DRYDOCK AVENUE
CLEVELAND, OH 44113
Toll Free Phone: 800-869-3949
Local Phone: 216-861-3949
Fax: 216-861-3156

Rev. 8/28/08

LABOR RATES

All labor rates are calculated portal to portal to and from our Inland Waters of Ohio Facility. Straight time rates apply to the first eight (8) hours of work performed at any time, between the hours of 0700-1700, Monday through Friday, excluding holidays. Any hours worked that exceed eight hours within these times will be billed at Overtime. Overtime rates apply to work performed outside the hours of 0700 and 1700, Monday through Friday and all day Saturday Premium rates apply to work performed on Sundays and holidays observed by Inland Waters of Ohio.

Labor Classification	Straight Time	Overtime	Premium Time
Technician	\$35.00/hour	\$45.00/hour	\$55.00/hour
Truck Driver	\$38.00/hour	\$48.00/hour	\$58.00/hour
Equipment Operator	\$45.00/hour	\$55.00/hour	\$65.00/hour
Foreman	\$45.00/hour	\$55.00/hour	\$65.00/hour
Response Manager	\$65.00/hour	\$65.00/hour	\$65.00/hour
Safety Officer	\$65.00/hour	\$65.00/hour	\$65.00/hour
Project Manager	\$65.00/hour	\$65.00/hour	\$65.00/hour
Sancho Operator	\$50.00/hour	\$60.00/hour	\$70.00/hour

Personal Protective Equipment

Level of Protection	Price per Person per shift
Level D	\$45.00
Level C	\$75.00
Level B	\$225.00
Level A	\$250.00 + Cost of Suit

Other Charges

Per diem will be charged at \$125.00 per person per night or cost, whichever is greater.

An insurance surcharge of 20% will be applied to all labor rates that require Longshoreman or Marine Insurance Coverage.

Mobile Oil Transfer - A mobile oil transfer fee of \$185 will be charged to cover dedicated hoses and equipment.

* A four hour daily minimum will apply to all personnel and equipment used on a given day.

* Equipment/Vehicle Rates do not include an operator.

* A mobilization/demobilization charge of \$85.00/hour (to and from jobsite) will be assessed to deliver all equipment that is not highway permitted.

* Truck Clean Outs may be charged out as follow:
 Non Regulated, Light Clean Out @ \$150.00.
 Non Regulated, Heavy Clean Out @ \$250.00.
 Hazardous Clean Out @ \$295.00 plus disposal costs.

* Emergency Response Rates apply for first 72 hours of a response. In hour 73 normal rates will apply.

* Fuel Surcharges apply for all vehicles and equipment used.

EQUIPMENT RATES

Vacuum Equipment *

Equipment Description	Hourly Rate
Guzzler (wet/dry)	\$43.00
Vec Loader (Hepa)	\$53.00
Semi Tractor/Vacuum Tanker (~5000 gallon)	\$43.00
Straight Wet Vacuum Truck (1500-3000 gallon)	\$43.00
Stainless Steel Vacuum Truck	\$63.00
Jetter/Vactor (Sewer Jet/Vac Truck Combination)	\$90.00
Ace Vac Truck (27" Blower)	\$90.00

Transportation – Support Vehicles *

Equipment Description	Hourly Rate	Daily Rate
Roll-Off truck (straight)	\$40.00	N/A
Semi Tractor/Roll Off Trailer	\$43.00	N/A
Semi Tractor/Carry All Trailer	\$43.00	N/A
Semi Tractor/40' van trailer	\$43.00	N/A
Semi Tractor/Tanker	\$43.00	N/A
Semi Tractor/Dump Trailer	\$43.00	N/A
Emergency Response Trailer	N/A	\$275.00
Stake Truck 1 ton/Pick Up(4WD)	N/A	\$75.00
Stake Truck/Box Truck (2 ton)	N/A	\$125.00
Pick Up Truck (2WD)	N/A	\$52.00
Passenger Sedan	N/A	\$50.00
Camera Truck (TV/Video)	\$80.00	N/A
Mini Camera (TV/Video)	\$55.00	N/A

Heavy Equipment *

Equipment Description	Rate/Hour	Rate/Day	Rate/Week	Rate/Month
Backhoe (4WD – CAT 426)	\$40.00	N/A	N/A	N/A
Street Sweeper	\$73.00	N/A	N/A	N/A
Skid Steer Loader w/Trailer	N/A	\$335.00	N/A	N/A
Skid Steer Hydraulic Accessories	N/A	\$50.00	N/A	N/A
Fork Lift (warehouse)	N/A	\$135.00	N/A	N/A
Fork Lift (yard)	N/A	\$200.00	N/A	N/A

Marine Vessels *

Equipment Description	Hourly Rate	Daily Rate
14' Jon Boat w/motor (rowboat)	N/A	\$135.00
20' MV "Sea Ark" w/70 hp motor	N/A	\$285.00
54' "Sancho" w/5 ton hydraulic crane	\$125.00	N/A

Containment Boom Accessories and Cleaning

Equipment Description	Rate/Day	Rate/Week	Rate/Month
Boom Rental (rate per foot)	\$1.25	\$3.75	\$11.25
USCG Approved boom Lights (each)	\$18.00	N/A	N/A
Boom Cleaning – Light	\$2.75/foot	N/A	N/A
Boom Cleaning – Heavy	T&M	N/A	N/A

Storage Containers

Equipment Description	Rate/Day	Rate/Week	Rate/Month
Storage Tanker (semi trailer)	\$150.00	\$875.00	N/A
IWO Roll Off Box (20 yard)	\$10.00 + liner	N/A	N/A
Dewatering Box	\$50.00 + filter liner	N/A	N/A

Sampling/Analysis Equipment

Equipment Description	Rate/Day
Interface Probe	\$125.00
Radiation Survey Meter	\$95.00
Multi Gas Meter	\$95.00
Photo Ionization Detector	\$150.00
Gastec Gas Detection System	\$50.00 + tubes
Mercury Vapor Analyzer (Jerome)	\$145.00
pH Meter	\$15.00

Pumps

Pumps are supplied with two 25' sections of hose. Additional hose is priced accordingly.

Equipment Description	Rate/Day	Rate/Week	Rate/Month
1" Pneumatic Double Diaphragm Pump	\$27.00	\$135.00	\$405.00
2" Pneumatic Sludge Pump	\$59.40	\$297.00	\$891.00
2" Pneumatic Double Diaphragm Pump	\$59.40	\$297.00	\$891.00
2" Trash Pump	\$37.80	\$189.00	\$567.00
2" Pneumatic Acid Pump	\$243.00 + cost to rebuild	\$729.00 + cost to rebuild	\$1458.00 + cost to rebuild
3" Trash Pump	\$54.00	\$270.00	\$810.00
3" Pneumatic Double Diaphragm Pump	\$64.80	\$324.00	\$972.00
4" Asphalt Pump	\$110.00	\$550.00	\$1650.00
4" Centrifugal Pump	\$115.00	\$575.00	\$1725.00
4" Hydraulic Pump (H & H)	\$275.00	\$1375.00	\$4125.00
Sump Pump (Electric)	\$8.00	\$40.00	\$120.00
Drum Pump	\$59.40	\$297.00	\$891.00

Hose

Equipment Description	Rate/Day	Rate/Week	Rate/Month
¾" Air (50')	\$6.50	\$32.40	\$97.20
1" Suction/Discharge (50')	\$8.50	\$43.20	\$129.60
1" Air (50')	\$10.80	\$54.00	\$162.00
2" Suction/Discharge (50')	\$12.90	\$64.80	\$194.90
2" Chemical/Acid (50')	\$37.80	\$189.00	\$567.00
2" Grounded Petroleum (50')	\$21.60	\$108.00	\$324.00
3" Suction/Discharge (50')	\$21.60	\$108.00	\$324.00
3" Grounded Petroleum (50')	\$37.80	\$189.00	\$567.00
6" Suction/Discharge (50' minimum)	\$1.35/foot	\$6.75/foot	\$20.25/foot
3" Lay Flat Discharge	\$0.50/foot	N/A	N/A
4" Suction/Discharge	\$0.50/foot	N/A	N/A
8" Vactor Pipe w/clamps	\$0.50/foot	N/A	N/A

Pneumatic Tools

Equipment Description	Rate/Day	Rate/Week	Rate/Month
Compressor (185 CFM)	\$90.00	\$450.00	\$1350.00
Jack Hammer (30#, 60#)	\$38.00	\$189.00	\$567.00
Coppus Blower/Lamb Air Mover/Air Hog	\$38.00	\$189.00	\$567.00
Reciprocating Saw	\$55.00 + blade cost	N/A	N/A
Drill	\$15.00	N/A	N/A
Chipper/Hand Tools	\$12.00	N/A	N/A

Specialty Equipment

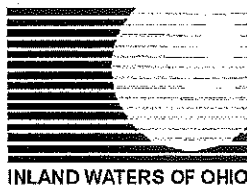
Equipment Description	Rate/Day	Rate/Week	Rate/Month
Tornado Vacuum and Accessories	\$200.00	N/A	N/A
Industrial wet/dry vacuum	\$43.20	N/A	N/A
HEPA Vacuum (Filters extra)	\$115.00	N/A	N/A
Mercury Vacuum	\$245.00	N/A	N/A
Mercury Response Gang Box	\$125.00	N/A	N/A
Cold Water Washer (1500 psi)	\$55.00	N/A	N/A
Hot Water Washer w/Attachments	\$185.00	N/A	N/A
Hot Water Washer (trailer mounted 2 gun)	\$225.00	N/A	N/A
Electric Ventilation Unit	\$45.00	N/A	N/A
Confined Space Egress (tripod w/RPD)	\$85.00	N/A	N/A
Shower Unit (personnel decon shower)	\$35.00	N/A	N/A
Concrete Road Saw w/blade	\$165.00	N/A	N/A
Roof Cutter, HEPA equipped	\$100.00	N/A	N/A
Chernie Ball (24" – 48" w/pass through)	\$58.00	N/A	N/A
Test Ball (24" w/pass through)	\$48.00	N/A	N/A
Chernie Ball (10")	\$36.00	N/A	N/A
Chernie Ball (8")	\$21.00	N/A	N/A
Chernie Ball (6")	\$10.00	N/A	N/A

Miscellaneous Equipment

Consumables not included

Equipment Description	Rate/Day	Rate/Week	Rate/Month
Generator (5KW)	\$50.00	N/A	N/A
Welder, Electric Arc	\$75.00	N/A	N/A
Propane Torch	\$20.00	N/A	N/A
Torpedo Heater	\$50.00	N/A	N/A
Reciprocating Saw, Electric	\$16.00	N/A	N/A
Chain Saw	\$50.00	N/A	N/A
Grinder, Electric	\$16.00	N/A	N/A
Impact Wrench, (½ inch)	\$16.00	N/A	N/A
Hand Tools (miscellaneous)	\$50.00	N/A	N/A
Leaf Blower	\$50.00	N/A	N/A
Arrow Board	\$85.00	N/A	N/A
Light Tower	\$90.00	N/A	N/A
Traffic Control Signs	\$135.00	N/A	N/A

See Attached Terms & Conditions



FUEL SURCHARGE NOTICE TO ALL INLAND WATERS OF OHIO CUSTOMERS

Dear Valued Customer:

To date we have successfully avoided passing along the repercussions of fuel cost increases that have impacted our industry. Unfortunately, we can no longer delay the inevitable effects of the lasting petroleum price increases and must implement the following fuel surcharges that will be appearing on your invoices.

The following schedule of rates will be applied on invoices for jobs using vehicles and equipment.

Inland Waters' Fuel Surcharge Schedule <i>Effective November 3, 2005</i>			
Surcharge for line items with operator		Surcharge for line items without operator	
Diesel Price per gallon	Surcharge (added to total equipment cost)	Diesel Price per gallon	Surcharge (added to total equipment cost)
\$1.80 - \$1.90	1.5%	\$1.80 - \$1.90	2.0%
\$1.91 - \$2.00	2.5%	\$1.91 - \$2.00	3.0%
\$2.01 - \$2.10	3.5%	\$2.01 - \$2.10	4.0%
\$2.11 - \$2.20	4.5%	\$2.11 - \$2.20	5.0%
\$2.21 - \$2.30	5.5%	\$2.21 - \$2.30	6.0%
\$2.31 - \$2.40	6.5%	\$2.31 - \$2.40	7.0%
\$2.41 - \$2.50	7.5%	\$2.41 - \$2.50	8.0%
\$2.51 - \$2.60	8.5%	\$2.51 - \$2.60	9.0%
\$2.61 - \$2.70	9.5%	\$2.61 - \$2.70	10.0%
\$2.71 - \$2.80	10.5%	\$2.71 - \$2.80	11.0%
\$2.81 - \$2.90	11.5%	\$2.81 - \$2.90	12.0%
\$2.91 - \$3.00	12.5%	\$2.91 - \$3.00	13.0%
\$3.01 - \$3.10	13.5%	\$3.01 - \$3.10	14.0%
<p>If diesel prices exceed this range, add 1% for every \$0.10/gallon increase.</p> <p>The applicable surcharge will be based on the petroleum pricing for the Midwest Region that appears at the DOE website below for the week work is performed.</p> <p style="text-align: center;">http://tonto.eia.doe.gov/oog/info/wohdp/diesel.asp</p>			

INLAND WATERS OF OHIO, INC. TERMS AND CONDITIONS

PERSONNEL

- Personnel rates apply to personnel performing work in support of the project (whether performed on-site or off-site). Rates stated are per person per hour with a four (4) hour minimum per person per day.
- All equipment and personnel will be billed portal-to-portal.
- Straight Time Rates apply to work performed between 7:00 a.m. to 5:00 p.m. Monday through Friday, exclusive of Inland Waters of Ohio's designated holidays. A calendar week is Monday through Sunday.
- Overtime Rates apply to all hours worked before 7:00 a.m. and/or after 5:00 p.m. Monday through Friday and all day Saturday. Work performed at the Overtime Rates will be billed at one and one-half (1.5) times the Straight Time Rates.
- Premium Rates apply to all work performed on Sundays and all Holidays observed by Inland Waters of Ohio.
- Personnel will be billed at the appropriate rate stated herein for time required to mobilize and restock all vehicles and equipment used in the performance of the work.

EQUIPMENT

- For purposes of computing Daily Rate charges, the term "Daily" means eight (8) hours. After 8 hours, the hourly rate will be 1/8 of the Daily Rate.
- Cleaning, repair and/or replacement charges will be assessed for equipment contaminated or damaged by site conditions beyond the control of Inland Waters of Ohio. Replacement of equipment contaminated or damaged beyond repair will be charged to the Project on which it was contaminated and/or damaged.
- Prices shall be applied to all materials and equipment which are utilized in the performance of the work.

OTHER TERMS AND CONDITIONS

- The client or his representative will make Inland Waters of Ohio aware of any obstructions and/or conditions that may affect the described work. Reasonable care will be used to prevent damage to site structures and grounds. However, Inland Waters of Ohio and /or its subcontractor(s) assume no liability for any structural or incidental damage

at the site resulting from the performance of the described work.

- All work will be performed in strict accordance with all federal, state and local laws and regulations regarding hazardous materials handling, transportation and disposal.
- It is agreed and understood that the Customer shall designate to Inland Waters of Ohio, the ultimate disposal sites for the subject waste to be disposed of under this Agreement. Inland Waters of Ohio may offer recommendations and/or alternatives concerning ultimate disposal sites, but it is agreed and understood that all final disposal site decisions shall be made by the Customer.

QUOTATION ACCEPTANCE

- The described work can be scheduled with the issuance of a purchase order, signed customer agreement or signed Authorization to Proceed. Facsimile transmissions are acceptable. Quotations are valid for ninety (90) days, unless other wise stated.
- The quoted costs and rates may be affected by factors including, but not limited to, changes in scope of work, material costs and delays beyond the control of Inland Waters of Ohio.

INVOICING

- The described work will be invoiced immediately upon completion. Monthly invoices will be issued for partially completed work, if applicable. Payment for any invoice is due upon issuance of the invoice; the charges become past due thirty (30) days after the invoice date. A finance charge of 1.5% per month (18% APR) will accrue on past due invoices.

PAYMENT

- Payment for all invoices should be sent to:

INLAND WATERS OF OHIO
2195 DRYDOCK AVENUE
CLEVELAND, OHIO 44113

ATTN: ACCOUNTS RECEIVABLE



**Bureau of Workers'
Compensation**

30 W. Spring St.
Columbus, OH 43215

Certificate of Premium Payment

This certifies the employer listed below has paid into the Ohio State Insurance Fund as required by law. Therefore, the employer is entitled to the rights and benefits of the fund for the period specified. For more information, call 1-800-OHIOBWC.

This certificate must be conspicuously posted.

Policy No. and Employer

Period Specified Below

786840

07/01/2009 Thru 02/28/2010

INLAND WATERS
2195 DRYDOCK
CLEVELAND, OH



ohiobwc.com

Marsha P. Ryan
Administrator

You can reproduce this certificate as needed.

Ohio Bureau of Workers' Compensation

Required Posting

Effective Oct. 13, 2004, Section 4123.54 of the Ohio Revised Code requires notice of rebuttable presumption. Rebuttable presumption means an employee may dispute or prove untrue the presumption (or belief) that alcohol or a controlled substance not prescribed by the employee's physician is the proximate cause (main reason) of the work-related injury.

The burden of proof is on the employee to prove the presence of alcohol or a controlled substance was not the proximate cause of the work-related injury. An employee who tests positive or refuses to submit to chemical testing may be disqualified for compensation and benefits under the Workers' Compensation Act.



**Bureau of Workers'
Compensation**

You must post this language with the certificate of premium payment.

DP-29 BWC-1629 7/7/08

ACORD CERTIFICATE OF LIABILITY INSURANCE		OP ID TH 9DISC02	DATE (MM/DD/YYYY) 03/25/09
PRODUCER LSG Insurance Partners 2369 Franklin Road PO Box 3000 Bloomfield Hills MI 48302-3000 as: 248-332-3100 Fax: 248-332-6396		THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW.	
INSURED Inland Industrial Services Group, LLC ** 1102 Howard Dr. Deer Park TX 77536		INSURERS AFFORDING COVERAGE INSURER A: American Intl Specialty Lines INSURER B: Commerce & Industry Ins Co INSURER C: Amerisure Mutual Insurance Co INSURER D: INSURER E:	NAIC # 23396

COVERAGES

THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. AGGREGATE LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR ADDL LTR INSR	TYPE OF INSURANCE	POLICY NUMBER	POLICY EFFECTIVE DATE (MM/DD/YY)	POLICY EXPIRATION DATE (MM/DD/YY)	LIMITS
A	GENERAL LIABILITY	PROP6439317	04/01/09	04/01/10	EACH OCCURRENCE
	<input checked="" type="checkbox"/> COMMERCIAL GENERAL LIABILITY				\$ 1,000,000
	<input type="checkbox"/> CLAIMS MADE <input checked="" type="checkbox"/> OCCUR				DAMAGE TO RENTED PREMISES (Ea occurrence)
					\$ 50,000
	GEN'L AGGREGATE LIMIT APPLIES PER:				MED EXP (Any one person)
	<input type="checkbox"/> POLICY <input checked="" type="checkbox"/> PRO-JECT <input type="checkbox"/> LOG				\$ 5,000
					PERSONAL & ADV INJURY
					\$ 1,000,000
					GENERAL AGGREGATE
					\$ 2,000,000
					PRODUCTS - COMP/OP AGG
					\$ 2,000,000
B	AUTOMOBILE LIABILITY	CA6439319	04/01/09	04/01/10	COMBINED SINGLE LIMIT (Ea accident)
	<input checked="" type="checkbox"/> ANY AUTO				\$ 1,000,000
	<input type="checkbox"/> ALL OWNED AUTOS				
	<input type="checkbox"/> SCHEDULED AUTOS				
	<input type="checkbox"/> HIRED AUTOS				BODILY INJURY (Per person)
	<input type="checkbox"/> NON-OWNED AUTOS				\$
					BODILY INJURY (Per accident)
					\$
					PROPERTY DAMAGE (Per accident)
					\$
	GARAGE LIABILITY				AUTO ONLY - EA ACCIDENT
	<input type="checkbox"/> ANY AUTO				\$
					OTHER THAN EA ACC
					AUTO ONLY: AGG
					\$
A	EXCESS/UMBRELLA LIABILITY	PROU6439318	04/01/09	04/01/10	EACH OCCURRENCE
	<input checked="" type="checkbox"/> OCCUR <input type="checkbox"/> CLAIMS MADE				\$ 5,000,000
	<input type="checkbox"/> DEDUCTIBLE				AGGREGATE
	<input checked="" type="checkbox"/> RETENTION \$10,000				\$ 5,000,000
					\$
					\$
					\$
					\$
C	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY	WC2058769	01/01/09	01/01/10	<input checked="" type="checkbox"/> WC STATUTORY LIMITS <input type="checkbox"/> OTHER
	ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED?				E.L. EACH ACCIDENT
	If yes, describe under SPECIAL PROVISIONS below				\$ 1,000,000
	INCLUDES OHIO STOP GAP.				E.L. DISEASE - EA EMPLOYEE
					\$ 1,000,000
					E.L. DISEASE - POLICY LIMIT
					\$ 1,000,000
A	Pollution Liability	PROP6439317	04/01/09	04/01/10	Each Loss
	1,000,000				
					Aggregate
					2,000,000

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES / EXCLUSIONS ADDED BY ENDORSEMENT / SPECIAL PROVISIONS

Industrial and Environmental Contractor. Additional Insured and special conditions will be afforded upon award of contract/job.

continued on attachment

CERTIFICATE HOLDER INFORMATION PURPOSES ONLY. PLEASE CONTACT AGENCY FOR CURRENT VERIFICATION	CANCELLATION SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, THE ISSUING INSURER WILL ENDEAVOR TO MAIL <u>NIL</u> DAYS WRITTEN NOTICE TO THE CERTIFICATE HOLDER NAMED TO THE LEFT, BUT FAILURE TO DO SO SHALL IMPOSE NO OBLIGATION OR LIABILITY OF ANY KIND UPON THE INSURER, ITS AGENTS OR REPRESENTATIVES. AUTHORIZED REPRESENTATIVE
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IMPORTANT

If the certificate holder is an **ADDITIONAL INSURED**, the policy(ies) must be endorsed. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).

If **SUBROGATION IS WAIVED**, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).

DISCLAIMER

The Certificate of Insurance on the reverse side of this form does not constitute a contract between the issuing insurer(s), authorized representative or producer, and the certificate holder, nor does it affirmatively or negatively amend, extend or alter the coverage afforded by the policies listed thereon.

NOTEPAD

NUMBER 0001

DATE 06/07

OF 0002

PAGE 01

INSURED NAME Inland Industrial Services Co.

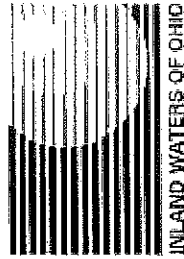
OF 0001

DATE 06/07

Attachment to Certificate of Liability Insurance issued to INFORMATION
PURPOSES ONLY.

Description of Operations Continued:

Named Insured includes: Debusk Industrial Services Company (DISC);
Infineon Industrial Services, LLC; Inland Waters of Ohio, Inc.; Inland
Waters Pollution Control Services, LLC; OmniChem, LLC; PMS Industrial
Services, LLC; National Labor Services.



Inland Waters of Ohio, Inc. employs a diverse team of experienced environmental and safety specialists dedicated to meeting the needs of our clients while ensuring regulatory compliance, protection of the environment and worker safety. All hazmat technicians are current with the OSHA 40 hour Hazwoper, as well as confined space and first aid and adult CPR.

A number of field personnel are also State of Ohio certified tank installers and/or certified asbestos abatement supervisors, and/or FAA qualified airside workers or operators.

The range of equipment that is immediately available to help solve your environmental problems includes:

Vacuum Trucks
Vacuum Tankers
JetterVacs
Street Sweepers
Fully Stocked Response Trailers
52' Response Vessel (MV Sancho)
HEPA Vacuum Systems
Water Blasters
Hot Water Washers
Front End Loaders
3000 Gallon Oil/Water Separator
185CFM Portable Air Compressor
Mercury Vacuums
Jerome Meters
Sewer TV Camera Vehicles
Glycol Recovery Vehicles

To Speak with one of our professionals, call 216-861-3949/800-869-3949
For additional information, visit our web-site at www.inlandwaters.com
2195 Drydock Avenue Cleveland, Ohio 44113

EMERGENCY RESPONSE

24 Hour Response
Petroleum Spills
Chemical Releases
Reactive Chemicals
Biohazard Material
Mercury Releases

SITE REMEDIATION

Phase I & II Assessments
Soil Removal
Vapor Recovery
Monitoring System Installation
Recovery Well Installation
In-Situ Remedial Processing
On-Site Wastewater Treatment

UNDERGROUND STORAGE TANKS

Site Assessment
Tank Removal
Site Remediation
Closure

TANK CLEANING

Petroleum Storage Tanks
Chemical Storage Tanks
Underground Service Vaults
Oil/Water Separator Maintenance
Neutralization Tank Cleaning
Liner Removal

HAZ, NON-HAZ WASTE MANAGEMENT

Waste Characterization
Drum and Bulk Waste Disposal
Lab Pack Chemical Disposal
Drum Pad Management
Drum Pad Closures
Storage Tank Closures
Resource Recovery
Mobile Oil Transfer
Mobile Chemical Transfer

PIPE MAINTENANCE

Locating
Jetting
TV Inspection
Pipeline Rehabilitation

DEMOLITION AND DECOMMISSIONING

Site and Structural Demolition
Selective & Interior Demolition
Turn Key Operation
Hazardous Waste Removal
Resource Recovery
Process Line Closure

INDUSTRIAL CLEANING

Power Washing
Steam Cleaning
Cryogenic Cleaning
Power Vacuuming

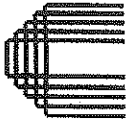
HAZARD ABATEMENT

Asbestos Surveys
Asbestos Removal
In-Place Abatement
Abatement Monitoring
Mold Abatement
Lead Removal/Abatement

AIRPORT SERVICES

Deicing Fluid Recovery
Maintenance of Transfer Systems
Deicing Fluid Management
Glycols Recycling
Jet Fuel Spill Cleanup
Sanitary Waste Spill Cleanup

"One Contractor One Call"



**Chemtron Corporation
Field Service Division**

To Whom It May Concern:

Chemtron Corporation, a leader in environmental solutions since 1972, is sending you the enclosed information about our services. We provide total environmental services to thousands of waste generators serviced throughout the United States. Our Field Service Division provides remediation services for fire and smoke damage, mold, chemical and water removal, and asbestos and lead abatement, as well as emergency response services.

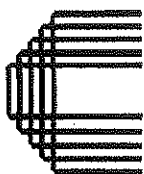
Our highly experienced, fully trained and certified service staff is eager to serve you and your customer needs. With our state of the art equipment, professional attitude and attention to detail, we can effectively meet the challenging demands of the industry standards.

We pride ourselves in forging long-term business relationships with our clients. Chemtron will work hard to earn your business and even harder to maintain it. Enclosed is information regarding our wide-range of services. For more information, contact a field service representative.

Chemtron would like to thank you for your consideration and looks forward to assisting you on future endeavors.

Sincerely,

**Nickie Majjasie
Field Service Manager**



Chemtron Corporation
Field Service Division

Dear Sir:

Thank you for inquiring about listing Chemtron Corp. as the Emergency Response Contractor for your facility. In order to most effectively respond to an incident at your facility we will need to update our records. Please supply us with the following information.

- > A list of the most hazardous and largest volume chemicals at your facility
- > A copy of your contingency plan
- > A facility map indicating storage / process areas and access routes
- > Emergency contact person(s) and their telephone numbers
- > An executed copy of our Emergency Spill Response Agreement

If possible, we recommend a brief facility walk through be incorporated into this pre-planning phase. This site visit can be scheduled at your convenience and is part of our service to you, at no charge. You can provide us with the listed information at this time as well.

We respond to spill emergencies on a 24-hour basis. Chemtron Corp. reserves the right to delay a response to your facility due to unforeseen and/or uncontrollable circumstances (e.g., a natural disaster; and act of war; and delay due to unique protective equipment needs; etc.). It should be noted that Chemtron Corp. can, and has effectively responded to multiple incidents at the same time.

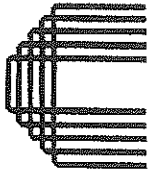
The Chemtron Corp. Emergency Response Phone Number Monday through Friday 7:30 AM to 5:00 PM is (440) 937-6379. After hours, weekends and holidays please call (440) 937-5950. Enclosed please find a Corporate Statement regarding qualifications of Chemtron Corp. employees, as well as other services we can provide.

Pending receipt and review of your facility information, credit review, and billing procedures, a file will be established for your facility. Additionally, we will provide you with a formal notification that Chemtron Corp. is in receipt of your Emergency Response Procedures, and that we will act as an emergency response contractor for your facility. We sincerely hope that you never have to use us in this capacity.

Thank you for your interest in Chemtron Corp. We look forward to assisting you with all your environmental and safety responsibilities.

Sincerely,

Karl Guenther
Vice President



Chemtron Corporation
Field Service Division

Dear Sir:

Chemtron Corporation is a permitted storage facility in Lorain County with a Part B Permit. Chemtron Corporation is a privately owned and operated corporation. Chemtron Corp. represents a commitment and dedication to providing economically sound and cost effective solution to problems associated with waste management. At Chemtron, we help companies protect the environment by responsibly and safely managing wastes. That is our commitment.

Chemtron's current activities consist of fuel blending of compatible wastes to be sent off site as a supplemental fuel, storage and consolidation of corrosive and metal bearing wastes, non haz mix pit for solidification of material, unused consumer products, Field Service and Emergency Response services.

Chemtron Corp. has been in operation since 1972. Since the acquisition by the Guenther Family in 1980, Chemtron has expanded its services to meet our customer's needs. Some of the other services provided are lab analysis for proper identification of various wastes to meet EPA requirements; waste management for generators who need assistance in recycling or disposing of their wastes using multiple permitted facilities; transportation for drum and bulk wastes within Ohio, and assisting in making arrangements with contract carriers to provide complete transportation services.. Chemtron conducts air monitoring for various constituents to insure compliance for OSHA standards for employee exposure.

We provide field service consisting of underground storage tank cleaning and removal, soil remediation, drum identification, packaging, labeling, manifesting, decontamination of Mercury, PCB's and other hazardous constituents.

Chemtron Corporation has added a 24-hour Hazardous Material Spill Response Service ready to respond to a chemical, hazardous or non hazardous release. With our remediation expertise this added service compliments our full range of Environmental Services. Our phone number Monday through Friday 7:30 AM to 5:00 PM is (440) 937-6379. After hours, weekends and holidays is (440) 937-5950.

Chemtron Corp. has a staff of seventy employees with 40 hour OSHA and emergency response training who have field experience to insure our customers of reliable, cost efficient services, and most of all working within the regulations to insure compliance.

Chemtron's history of compliance with the Ohio and Federal EPA speaks for itself. We have worked diligently to upgrading our facility and our personnel as new regulations have been initiated to maintain our compliance.

Chemtron Corp. maintains a customer base of over seven hundred. These customers range in size from small quantity generators to large generators such as Ohio EPA, NASA Lewis Research Center, LTV Steel Company, Ohio Turnpike Commission, Cuyahoga County Engineers, Lincoln Electric Company and Modern Tool and Die Company.

The management of Chemtron Corp. is dedicated to providing the best service available for our customers. We will customize a waste management program to fit any size customer. We will assist with the documentation required for the various reports required by the regulatory agencies.

Chemtron has coordinated with other approved permitted facilities which work closely with us in the recycling, treatment and disposal of wastes Chemtron is currently not permitted to accept. This working relation with other facilities provides Chemtron the opportunity to handle and manage a wide category of wastes. This alleviated the need to secure multiple waste facilities.

If you have any questions or require any further information please do not hesitate to contact me.

Sincerely,

Karl Guenther
Vice President

Chemtron Field Service Job References

1. Go Jo Industries, Inc. , State Road, Cuyahoga Falls, Ohio
Contact: Mark Schweirdtfeger (330) 255-6498, Fax (330) 255-6195
Scope: Chemtron Corporation provided service to close a former non hazardous lagoon as well as design and construct an emergency containment system for their overflow drainage. Three 20,000 gallon tanks were placed in a vault constructed out of concrete. New sewer lines were installed with pump stations. This project was completed this year.
2. NASA Glenn Research Center; 21000 Brookpark Road, Cleveland, Ohio 44135
Contact: Mike Bajorek (216) 433-2124, Fax (216) 433-2014
Scope: Chemtron has provided services for the Cleveland and Plumbrook stations. The various projects included disposal services for various RCRA materials that are being generated, emergency response for mercury spills, mercury decontamination of rooms, buildings, and other structures, confined space entry for tanks, pits and trenches and complete analytical services for unknown wastes and remedial jobs and inventorying and lab packing.
3. Beazer-East Inc.; One Oxford Center, Suite 3000, Pittsburgh, Pennsylvania 15219
Contact: Robert Fisher (412) 208-8860, Fax (412) 208-8850
Scope: Chemtron has provided services for the Bridgeville, PA, New Brighton, PA., West Allis, WI, Youngstown, Orrville, Cleveland, Toledo and Newell locations. The projects have included tank cleaning, site assessments, site decontamination and demolition.

The Youngstown facility was a former Tar Plant with tanks ranging from 100,000 gallon to 500,000 gallon. We removed contents, pipe removal, cleaning, transportation and disposal.

At the former Toledo Coke plant we cleaned various tanks, scrubbers and piping. We also removed underground trenches and gas lines; backfilled, demolition of all buildings, including a 200' smoke stack, and transportation and disposal of all material.

In Orrville, Ohio we excavated and solidified approximately 6,000 tons of contaminated soil, backfilled and seeded.

4. Westside Industrial Retention and Expansion Network (WIRE-Net)
Voluntary Action Program and Site Restoration Project.
Contact: Michael Hoag, Real Estate Development Manager (216) 631-7330
Scope: 14.5 acre site - Voluntary Action Program for a former Industrial area located at West 65th Street, Cleveland, Ohio. Project included 3 BUSTR

regulated USTs removal / closure, 2 RCRA regulated USTs removal and closure of a former dry cleaning facility and the demolition of two structures.

5. Alcon Industries, Cleveland, Ohio. Bioremediation of Petroleum Contaminated Soils.
Contact: Chris Spilker, Controller (216) 961-1100.
Scope: Design, development, and installation of an ex-situ bioremediation system utilizing indigenous bacterium for the remediation of 850 cubic yards of petroleum and low level chlorinate contaminated soils. Design, development, and installation of an in-situ bioremediation system utilizing air injection technology and indigenous bacterium of 1,760 cubic yards of gasoline contaminated soils.
6. Bonne Bell, Westlake, Ohio. Design, development and installation of a vaulted above ground storage tank system.
Contact: Mark Wincek, Manager of Environmental, Safety, and Health (440) 808-2416.
Scope: Removal of a 300 gallon UST system and replaced with a subterranean vaulted AST system. System was classified as an above ground tank system within the City of Westlake, Ohio.
7. United States Coast Guard; Marine Safety Office, 1055 East Ninth Street, Cleveland, Ohio
Contact: Marine Science Technician (216) 522-4405
Scope: Chemtron is one of two contractors in northeast Ohio, Michigan and Pennsylvania having a Basic Order of Agreement for oil spill / hazardous material cleanup.
8. United States Environmental Protection Agency, Westlake, Ohio 44145
Contact: Mark Durno (440) 250-1743
Scope: Chemtron provided oil cleanup services for the USEPA at a Medina oil field through our USCG Boa contract. There were numerous leaking wells that were capped. We provided soil cleanup and restoration of the area. This project took three months.
9. CSX Transportation, Jacksonville, Florida
Contact: Ed Cook,
Scope: Emergency Response Contractor responding to all areas of the cleanup process and disposal of waste material generated.

EMERGENCY SPILL RESPONSE AGREEMENT

This Agreement is made this _____ day of _____ 20____, by and between CHEMTRON CORPORATION, an Ohio corporation with offices located at 35850 Schneider Court, Avon, Ohio, 44011, ("CONTRACTOR"), and _____, a(n) _____ corporation with its principal place of business at _____ ("CUSTOMER").

WHEREAS, CONTRACTOR is engaged in the business of providing Emergency Response Services to respond to discharges of hazardous substances; and

WHEREAS, CUSTOMER desires to engage CONTRACTOR to provide such services; and,

WHEREAS, CUSTOMER and CONTRACTOR desire to establish the terms and conditions pursuant to which such Services will be provided

NOW, THEREFORE, in consideration of the mutual covenants contained herein and for other good and valuable consideration, the sufficiency and receipt of which are hereby acknowledged, the parties, intending to be legally bound, agree as follows:

SECTION 1. PURPOSE

- 1.1 This agreement establishes the terms and conditions under which CONTRACTOR shall provide remedial and other services in connection with the discharge of hazardous substances from: _____ ("Event").

SECTION 2. SCOPE OF SERVICES

- 2.1 The Services contemplated in connection with the response to discharges of hazardous substances related to the Event may include, but not limited to, the following: containment, recovery, repackaging, and removal of materials; site evaluation, decontamination and restoration; transportation, storage, treatment or disposal of wastes; technical services, including sampling, laboratory analysis, and other related services; and/or standby of personnel and equipment in anticipation of imminent activation. (hereinafter "Services")

SECTION 3. CONTRACTOR'S WARRANTIES

- 3.1 CONTRACTOR shall provide supervision, labor, materials, tools, equipment and subcontracted items for the performance of the Services.
- 3.2 CONTRACTOR shall take necessary precautions for the safety of its employees, and shall comply with applicable provisions of the Occupational Safety and Health Act. It is understood and agreed, however, that CONTRACTOR shall not be responsible for the elimination, or abatement of safety hazards created by or otherwise resulting from work being performed by CUSTOMER'S employees, its contractors or agents.
- 3.3 CONTRACTOR represents that it holds the permits and licenses required for the performance of Services.

SECTION 4. CUSTOMER'S WARRANTIES

- 4.1 CUSTOMER shall provide full and complete information regarding its requirements for the Services.
- 4.2 CUSTOMER shall designate a representative who shall be fully acquainted with the Services to be provided hereunder and who shall be authorized to approve changes in the Services; render decisions promptly; authorize commitments and expenditures on behalf of CUSTOMER; approve CONTRACTOR'S daily worksheets and to accept, verify and approve CONTRACTOR'S invoices.
- 4.3 CUSTOMER shall be responsible for repairs to all roadways, structures and rights-of-way resulting from CONTRACTOR'S reasonable use thereof.
- 4.4 CUSTOMER represents and warrants that it shall provide payment to CONTRACTOR for the services provided by CONTRACTOR as set forth in Section 5, and shall demonstrate (including entering into an unconditional and absolute guarantee agreement at CONTRACTOR'S request) to CONTRACTOR'S satisfaction prior to the commencement of the Services, and at such other times as CONTRACTOR may require, that sufficient funds are available and committed by CUSTOMER for the entire cost of the Services. Unless such financial assurances are provided by CUSTOMER, CUSTOMER agrees that CONTRACTOR shall not be required to commence or continue any Service and may immediately stop work. The failure of CONTRACTOR to insist upon the provisions of this paragraph any one time shall not constitute a waiver of CUSTOMER'S obligation to make payments pursuant to this Agreement nor shall it constitute a waiver of CONTRACTOR'S right to request that evidence of sufficient funds be provided by CUSTOMER at a later date.
- 4.5 CUSTOMER shall communicate to CONTRACTOR all special hazards or risks known to the CUSTOMER which are related to the performance of Services pursuant to this Agreement.

SECTION 5. COMPENSATION

- 5.1 CUSTOMER agrees to pay CONTRACTOR in accordance with the Rate and Fee Schedule (hereinafter "Rates" which is attached hereto and is hereby incorporated by reference) for Services provided including but not limited to response or standby activities, including mobilization/demobilization of resources. CUSTOMER AGREES THAT ALL HOURLY RATES WILL BE BILLED AS AN EIGHT HOUR MINIMUM AND ON A PORTAL-TO-PORTAL BASIS.
- 5.2 CONTRACTOR will present its first invoice to CUSTOMER as soon as possible following commencement of Services provided hereunder, and subsequent invoices every ten (10) days thereafter. CONTRACTOR'S delay in presenting an invoice shall not be constituted as a waiver of CUSTOMER'S duty to pay within 15 days. CUSTOMER agrees to pay the full amount of each invoice

amount within fifteen (15) days of the date of receipt of said invoice by CUSTOMER.

- 5.3 CUSTOMER agrees that interest shall accrue and will be paid to CONTRACTOR on any unpaid balance of any invoice (including during insurance review) after fifteen (15) calendar days of receipt of invoice by CUSTOMER at the rate of one and one half percent (1.5%) per month or the maximum amount allowed by law, whichever is greater.
- 5.4 In the event that legal or other action is required to collect unpaid balances of invoices due CONTRACTOR, CUSTOMER agrees to pay all costs of collection, litigation or settlement incurred by CONTRACTOR, including any reasonable attorneys fees.
- 5.5 In the event that work is suspended or terminated for any reason prior to the completion of the services, CUSTOMER agrees to pay for labor, equipment, materials, disposal and other costs incurred by CONTRACTOR at the agreed Rates.
- 5.6 CUSTOMER agrees to pay CONTRACTOR in accordance with the agreed Rates for CONTRACTOR activities, at CUSTOMER'S request, in connection with any litigation, litigation support or testimony related to the work performed by CONTRACTOR pursuant to this Agreement.
- 5.7 In the event that CUSTOMER submits CONTRACTOR's invoice for insurance coverage, CONTRACTOR hereby agrees to pay any and all balances not covered by CUSTOMER's insurer unless CONTRACTOR has waived such balance in writing.
- 5.8 CUSTOMER understands and agrees that it will pay CONTRACTOR for the Services contemplated hereunder regardless of fault of another party for causing such Services to be necessary and without regard as to the actual property owner.

SECTION 6. CHANGES IN WORK

- 6.1 Modifications, including assignments, to this Agreement shall be effective only if in writing and signed by the CUSTOMER and CONTRACTOR.
- 6.2 CUSTOMER agrees to pay CONTRACTOR at the agreed Rates for any costs incurred or delays resulting from CONTRACTOR'S response to any emergency condition which threatens safety of persons or property during the performance of the Services.
- 6.3 If any change occurs during the term of this Agreement with respect to any laws, rule, regulations or ordinances which affect the rights or obligations of CUSTOMER or CONTRACTOR under this Agreement, or the applicability of any taxes or fees, or the cost of handling waste materials, CUSTOMER and CONTRACTOR shall negotiate in good faith to bring this Agreement into conformance with such change or changes. In the event that such agreement cannot be reached, CUSTOMER or CONTRACTOR shall have the right to terminate this Agreement immediately upon written notice to the other party.

SECTION 7. INSURANCE

- 7.1 CONTRACTOR shall keep in effect during the term of this Agreement the following insurance coverage:

COVERAGE
Worker's Compensation
Auto Liability
Comprehensive General Liability
Contractors Error & Omissions
Pollution Liability
Excess Liability

LIMITS
Statutory
\$1 million per occurrence, \$1 million aggregate
\$1 million per occurrence, \$1 million aggregate
\$1 million per occurrence, \$1 million aggregate
\$1 million per occurrence, \$1 million aggregate
\$4 million per occurrence, \$4 million aggregate

- 7.2 CONTRACTOR shall provide CUSTOMER with a certificate(s) of insurance upon written request.

SECTION 8. INDEMNIFICATION

- 8.1 CONTRACTOR agrees to indemnify and hold harmless CUSTOMER, its directors, officers, employees and agents from and against any and all costs, liabilities, claims, demands and causes of action including, without limitation, bodily injury to or death of any person or destruction of or damage to any property, except natural resource and other damages as provided in Section 8.3, which CUSTOMER suffer, incur, or pay out, to the extent such are caused by the negligence or willful misconduct of CONTRACTOR, its agents or employees during the performance of the Agreement, or CONTRACTOR'S failure to comply with any laws, regulations or lawful authority or failure to comply with its obligations under this Agreement; except to the extent such liabilities, claims, demands and causes of action result from CUSTOMER'S failure to comply with any laws, regulations or other lawful authority, or CUSTOMER'S failure to comply with its obligations under this Agreement or result from the negligence or willful misconduct of CUSTOMER, its employees or agents.
- 8.2 CUSTOMER shall indemnify and hold harmless CONTRACTOR, its parent and affiliated companies and their respective directors, officers, employees and agents from and against any and all costs, liabilities, claims, demands and causes of action including, without limitation, any bodily injury to or death of any person or destruction of or damage to property which CONTRACTOR may suffer, incur, or pay out, to the extent such are caused by the negligence or willful misconduct of CUSTOMER, its employees or agents or the failure of CUSTOMER to comply with any laws, regulations or other lawful authority or the failure of CUSTOMER to comply with its duties or obligations under this Agreement; except to the extent such liabilities, claims, demands and causes of action result from CONTRACTOR'S failure to comply with any laws, regulation or lawful authority, or CONTRACTOR'S failure to comply with its obligations under this Agreement or result from the negligence or willful misconduct of CONTRACTOR, its employees or agents.
- 8.3 Notwithstanding the foregoing, CUSTOMER shall indemnify, defend and hold harmless CONTRACTOR, its parent and affiliated companies and their respective directors, officers, employees, agents and subcontractors from and against any and all costs, liabilities, claims, demands and causes of action for pollution damages; contamination or adverse effects on the environment; destruction of, damage to, or loss of, whether actual or alleged, any property or natural resources, including the cost of assessing the damage; injury to or economic losses resulting from destruction of real or personal property; damages for loss of subsistence use of natural resources; damages equal to the loss of profits or impairment of earning capacity due to the injury, destruction or loss of real property, personal property or natural resources; damages for net costs of providing increased or additional public services; removal cost; and any other costs assessable under the Oil Pollution Act, the Comprehensive Environmental Response, Liability and Compensation Act or other local, state, or federal law or lawful authority applicable to discharges or releases of hazardous

substances which they, individually or collectively, may suffer, incur, or pay out in connection with, or arising out of the Event.

- 8.4 The rights and obligations of the parties under this Agreement shall inure to the benefit of and shall be binding upon the legal representatives, heirs, and assigns of the parties.

SECTION 9. EXCUSE OF PERFORMANCE

- 9.1 The performance of the Agreement, except for the payment of money for Services already rendered, may be suspended by either party in the event performance of this Agreement is prevented by a cause or causes beyond the reasonable control of such party. Such causes include but are not limited to: acts of God, war, riots, fire, explosion, inclement weather, labor disputes, strikes and lock-outs. The party which is prevented from performing by a cause beyond its reasonable control shall use its best efforts to eliminate such cause or event.

SECTION 10. TERMINATION

- 10.1 This Agreement may be terminated by either party upon forty-eight (48) hours prior notice to the other party.

SECTION 11. NOTICE

- 11.1 NOTICE - Any notice required or permitted to be given under this Agreement shall be sufficient if in writing and delivered by certified mail to the address listed below:

Customer:

Phone # _____

Attention: _____ Fax # _____

Contractor:

Chemtron Corporation

35850 Schneider Court

Avon, OH 44011

Attention: General Counsel

SECTION 12. ADDITIONAL PROVISIONS

- 12.1 WAIVER - Any waiver by either party of any provision or condition of this Agreement shall not be construed or deemed to be a waiver of any other provision or condition of this Agreement, nor a waiver of a subsequent breach of the same provision or condition.
- 12.2 SEVERABILITY - If any section, subsection, sentence or clause of this Agreement shall be deemed to be illegal, invalid or unenforceable for any reason, such illegality, invalidity or unenforceability shall not affect the legality, validity or enforceability of this Agreement or other sections of this Agreement.
- 12.3 ENTIRE AGREEMENT - This Agreement and exhibits to this Agreement, represent the entire understanding and agreement between CUSTOMER and CONTRACTOR and supersede any and all prior agreements, whether written or oral, that may exist between the parties regarding the same. Additional, conflicting or different terms on any Purchase Order or other preprinted document issued by CUSTOMER shall be void and are hereby expressly rejected by CONTRACTOR.
- 12.4 SURVIVAL - Any provision of this Agreement setting forth an obligation or duty which by its very nature cannot be performed during the actual life of this Agreement shall be deemed to survive expiration, termination, completion, or cancellation of the Agreement.
- 12.5 APPLICABLE LAW - This Agreement shall be interpreted and enforced according to the Laws of the State of Ohio.
- 12.6 BINDING EFFECT - The rights and obligations of the parties under this Agreement shall inure to the benefit of and shall be binding upon the legal representations, heirs, and assigns of the parties.
- 12.7 JURISDICTION AND VENUE - All disputes arising under this Agreement (other than disputes for which specific performance or other injunctive relief may be sought because monetary damages are inadequate) shall be filed exclusively in the United States District Court of the Northern District of Ohio, Eastern Division, or the Court of Common Pleas for Lorain County, Ohio. Each of the parties agrees to voluntarily submit to, and irrevocably consent to, the exclusive jurisdiction of such courts and to waive and agree not to assert any defense of lack of personal jurisdiction, improper venue or forum non-conveniens.

IN WITNESS WHEREOF, the parties have caused this Agreement to be executed by their duly authorized representatives as of the day and year first above written.

CUSTOMER: _____ (signature)

CHEMTRON: _____ (signature)

Printed Name: _____

Printed Name: _____

Title: _____

Title: _____

**Chemtron Corporation
Emergency Response
Rate Schedule**

PERSONNEL

Field Operations

Hourly

Premium (Sunday &
Hourly Holiday)

Project Manager	\$ 71.00	\$ 81.00
Supervisor	\$ 55.00	\$ 65.00
Technician	\$ 47.00	\$ 57.00
Equipment Operator	\$ 48.00	\$ 68.00
Driver	\$ 45.00	\$ 55.00
Mechanic / Welder / Electrician	\$ 45.00	\$ 55.00
Field Safety Operator	\$ 55.00	\$ 65.00
Per Diem / Per Man / Overnight Stay	\$ 95.00	\$ 95.00

Technical Services

Registered Professional Engineer	\$ 105.00
Geologist / Scientist	\$ 85.00
Project Chemist	\$ 75.00
Field Sampling Technician	\$ 60.00

- All Hourly Rates are Portal to Portal - Minimum of eight hours.

SAFETY EQUIPMENT

Level 'A' Responder Suits	Will Quote
Level 'B'	\$ 500.00 / Per Man
Level 'C'	\$ 80.00 / Per Man
Level 'C' Mercury / Acid	\$ 95.00 / Per Man
Level 'D'	\$ 35.00 / Per Man

MATERIALS

Absorbent Boom 5" x 10'	\$	85.00	/ Bundle
Absorbent Boom 8" x 10'	\$	120.00	/ Bundle
Absorbent Pads	\$	75.00	/ Bale
Bleach	\$	4.00	/ Gallon
Caution Tape	\$	30.00	/ Roll
Colliwasa	\$	15.00	/ Each
Drum 1A1 & 1A2 55 Gal. Steel	\$	30.00	/ Each
Drum Five Gallon Pail	\$	12.50	/ Each
Drum Liners Heavy Gauge	\$	17.50	/ Each
Drum Over Pack 85 Gal. Poly	\$	160.00	/ Each
Duct Tape	\$	4.50	/ Roll
Flex Hose	\$	1.00	/ Foot
HgX Powder	\$	22.50	/ Pound
Poly Bags	\$	3.75	/ Each
Speedi Dry	\$	6.00	/ Bag
Vermiculite	\$	25.00	/ Bag
Visqueen Poly Sheeting (20 x 100)	\$	55.00	/ Roll
Visqueen Poly Sheeting (40 x 100)	\$	85.00	/ Roll

EQUIPMENT**Transportation Equipment**

Dump Trailer	\$	85.00	/ Hour
Elgin Street Sweeper with Operator	\$	110.00	/ Hour
Emergency Response Truck	\$	500.00	/ Day
Field Truck	\$	20.00	/ Hour
Flat Bottom Boat - Sixteen Foot with motor	\$	225.00	/ Day
Liftgate Truck	\$	30.00	/ Hour
Sewer Jet with Operator	\$	95.00	/ Hour
Super Vac - 3400 Gallon (Cusco)	\$	125.00	/ Hour
Tractor / Dump, Flatbed, Van Trailer	\$	70.00	/ Hour
Vactor	\$	95.00	/ Hour
Vacuum Tractor Trailer - 5,000 to 6,000 Gal.	\$	90.00	/ Hour
Waterblaster - 10,000 psi with Operator	\$	90.00	/ Hour
Waterblaster - 15,000 psi with Operator	\$	110.00	/ Hour
Waterblaster - 20,000 psi with Operator	\$	130.00	/ Hour

Miscellaneous Equipment

Air Sampling Kit	\$	30.00	/ Day
Compressor - 175 cfm	\$	200.00	/ Day
Compressor - Small for small pump / hand tools	\$	75.00	/ Day
Confined Space Kit	\$	225.00	/ Day
Generator	\$	85.00	/ Day
Hand Tools	\$	115.00	/ Day
Light - Explosion Proof	\$	110.00	/ Day
Lights - Drop	\$	50.00	/ Day
Man Hole Blower	\$	140.00	/ Day
Mercury - Jerome Analyzer	\$	250.00	/ Day
Mercury Vacuum	\$	200.00	/ Day
Meter - Tri, LEL	\$	125.00	/ Day
Nibbler	\$	225.00	/ Day
Personal Air Monitors	\$	30.00	/ Day
Photo Ionized Detector	\$	75.00	/ Day
Power Washer - 2500 psi	\$	65.00	/ Day

Power Washer - 4000 psi Hot - Cold	\$ 225.00 / Day
Power Washer - 5000 psi Hot - Cold	\$ 325.00 / Day
Pump - 2" Diaphragm	\$ 60.00 / Day
Pump - 2" Electric Sump	\$ 60.00 / Day
Pump - 3" Gas Trash	\$ 115.00 / Day
Pump - Misc.	\$ 65.00 / Day
Sawz-All	\$ 70.00 / Day

Construction Equipment

Excavator	\$ 110.00 / Hour
Loader	\$ 105.00 / Hour
Backhoe Loader	\$ 80.00 / Hour
Bobcat Loader	\$ 65.00 / Hour
Tow Motor	\$ 25.00 / Hour
Bulldozer D4-5	\$ 110.00 / Hour
Crane 200 Ton	\$ 550.00 / Hour
Mob & Demob	TBD
Permit	\$ 200.00
Crane 150 Ton	\$ 500.00 / Hour
Mob & Demob	TBD
Permit	\$ 200.00
Crane 85 Ton	\$ 300.00 / Hour
Mob & Demob	TBD
Permit	\$ 200.00
Crane 30 Ton	\$ 175.00 / Hour
Crane 22 Ton	\$ 150.00 / Hour
Crane 15 Ton	\$ 150.00 / Hour

Mob & Demob will be quoted depending on area.
All charges are based on eight hour minimum.

APPENDIX III

SPILL PREVENTION, CONTROL AND COUNTERMEASURES (SPCC) PLAN

**THE LUBRIZOL CORPORATION (Lubrizol)
PAINESVILLE FACILITY**

155 Freedom Road
Painesville, Ohio 44077

December 2009

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3. Plant Wide Sewer Layout
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8. Storm Sewer Outfalls
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10. Inventory of Electrical Transformers and Emergency Generators
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I. Introduction

The Lubrizol Corporation (Lubrizol) owns and operates a facility in Painesville, Ohio (Painesville facility). This SPCC Plan for the Painesville facility describes the procedures, methods and equipment to prevent the discharge of oil to navigable waters or shorelines of Blackbrook Creek, which is a watershed for the Mentor Marsh, which then flows into Lake Erie. Through a combination of secondary containment structures, process and storm sewer systems, spill response equipment and a commitment of manpower, the Painesville facility will effectively control and manage potential discharges of oil.

This plan is intended to fulfill the requirements of 40 CFR 112, and to provide a basis for training facility personnel in proper inspection, maintenance and spill control procedures related to oil pollution prevention.

U.S. EPA's July 17, 2002 40 CFR Part 112 SPCC Final Rule applies to non-transportation-related onshore or offshore facilities "engaged in drilling, producing, gathering, storing, processing, refining, transferring, distributing, using, or consuming oil and oil products." Except as noted under 112.1(d), the Lubrizol Painesville facility is a non-transportation-related on-shore facility that stores and uses petroleum-based oil and oil products, and has a total aboveground oil storage capacity greater than the 1,320 gallon minimum volume threshold referenced in 112.1(d)(2)(ii).

As such, the following Subparts of 40 CFR 112 apply to the development of this SPCC Plan:

- 40 CFR § 112.7 General Requirements for SPCC Plans
- 40 CFR § 112.8 SPCC Plan Requirements for On-Shore Facilities

PROFESSIONAL ENGINEER'S CERTIFICATION

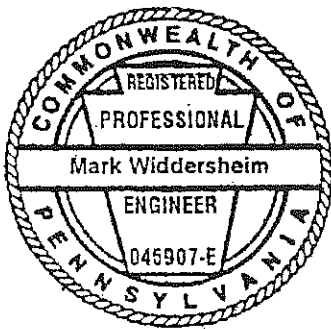
It is recognized that the Painesville facility operation is subject to the Oil Pollution Prevention Regulation and a Professional Engineer's review and certification of the SPCC Plan is required under 40 CFR Section 112.3(d). By means of this certification, the Professional Engineer attests that:

- (i) He is familiar with the requirements of the SPCC rule;
- (ii) He or his agent has visited and examined the facility;
- (iii) The SPCC Plan has been prepared in accordance with good engineering practice, including consideration of applicable industry standards, and with the requirements of the SPCC rule;
- (iv) Procedures for required inspections and testing have been established; and,
- (v) The SPCC Plan is adequate for the facility.

Therefore, I, Mark R. Widdersheim, certify that I am familiar with the July 17, 2002 Final SPCC Rule, that I (or my representative) have visited and examined the Painesville facility, and that the provisions of this SPCC Plan, have been prepared in accordance with good engineering practices. I attest that the information provided by the facility and contained herein is, to the best of my knowledge and belief, true, accurate, and complete.

This certification shall in no way relieve the Painesville facility of their duty to prepare, revise, and fully implement the SPCC Plan in accordance with 40 CFR Part 112 and all other applicable requirements of the State of Ohio.

(SEAL)



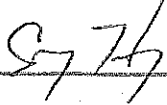
Mark R. Widdersheim
Name

October 31, 2005
Date

Mark R. Widdersheim, PE
License Number PE045907E

SPILL PREVENTION, CONTROL AND COUNTERMEASURE PLAN
MANAGEMENT APPROVAL 40 CFR 112.7

This SPCC plan is fully approved by the management of the Painesville facility and the necessary resources have been committed to implement the plan as described.



23 - DECEMBER, 2009

Craig Hupp - General Manager

Date

FIVE YEAR REVIEW PLAN SUMMARY PAGE

In accordance with 40 CFR 112.5(b), a review and evaluation of this SPCC Plan is conducted at least once every three years prior to August 16, 2002, and at least once every 5 years after August 17, 2002. These reviews and evaluations are recorded below:

<u>Reviewer (signature)</u>	<u>Reviewer (print)</u>	<u>Date</u>	<u>Comments</u>	<u>P.E. Recert Required?</u>
-----------------------------	-------------------------	-------------	-----------------	------------------------------

1.

2.

3.

4.

A complete copy of the SPCC Plan is maintained at the office of this facility per 112.3 (e)(1).

INTRODUCTION TO REGULATORY REQUIREMENTS

Spill Prevention, Control, and Countermeasure (SPCC) plans for facilities are prepared and implemented as required by the U.S. Environmental Protection Agency (U.S. EPA) regulations contained in Title 40, Code of Federal Regulations, Part 112, (40 CFR 112). A non-transportation related facility is subject to SPCC regulations if: the aggregate aboveground capacity of the facility exceeds 1,320 gallons (excluding those tanks and oil filled equipment below 55 gallons in capacity) or if the aggregate underground capacity of the facility exceeds 42,000 gallons (excluding those that are currently subject to all of the technical requirements of 40 CFR Part 280 or all of the technical requirements of state programs approved under 40 CFR Part 281.); and if, due to its location, the facility could reasonably be expected to discharge oil into or upon the navigable waters or adjoining shorelines of the United States.

An SPCC plan is not required to be filed with the US EPA, but a copy must be available for on-site review by the Regional Administrator (RA) during normal working hours. The SPCC plan must be submitted to the US EPA Region 5 RA and the state agency along with the other information specified in Section 112.4 (a) if either of the following occurs:

- The facility discharges greater than 1,000 gallons of oil into or upon the navigable waters of the United States or adjoining shorelines in a single spill event; **or**
- The facility discharges greater than 42 gallons of oil into or upon the navigable waters of the United States or adjoining shorelines in each of two spill events within any twelve month period.

The following spill information must be submitted to the RA within 60 days if either of the above thresholds is reached. This report is to contain the following information (112.4 (a)):

- Name of the facility.
- Name of the individual submitting the information.
- Location of the facility.
- Maximum storage or handling capacity of the facility and normal daily throughput.
- The corrective actions and/or countermeasures taken, including adequate description of equipment repairs and/or replacements.
- Description of the facility including maps, flow diagrams, and topographical map.
- The cause(s) of such spill(s), including a failure analysis of system or subsystem in which failure occurred.
- Additional preventive measures taken or contemplated to minimize the possibility of recurrence.
- Such other information as the Regional Administrator may reasonably require that is pertinent to the plan or spill event(s).

The SPCC plan must be amended within 6 months whenever there is a change in facility design, construction, operation, or maintenance that materially affects the facility's spill potential. The SPCC plan must be reviewed at least once every 5 years and amended to include more effective prevention and control technology, if such technology will significantly reduce the likelihood of a spill event and has been proven in the field. All technical amendments must be re-certified by a registered professional engineer (PE).

FACILITY INFORMATION

Facility Name: The Lubrizol Corporation (Lubrizol) - Painesville Plant

Mailing Address: 155 Freedom Road
Painesville Township
Lake County
Ohio 44077
(440) 357-7064

Street Address: Same as above.

Owner: The Lubrizol Corporation
29400 Lakeland Boulevard
Wickliffe
Lake County
Ohio 44092
(440) 943-1200

Contact Name: Gwendolyn McDay, Environmental Assurance Engineer
155 Freedom Road
Painesville, Ohio 44077
(440) 347-3594

Other Personnel: Ken Frato, EH&S Manager
155 Freedom Road
Painesville, Ohio 44077
(440) 347-3629

Location: The Painesville facility is located 0.3 miles south of state Route 2, east of the intersection of state Routes 2 and 44.

Facility Description: The Painesville facility manufactures fluid technology products for the transportation and chemical industries. Primary product categories include dispersants, detergents, emulsifiers, coatings and rheologic/viscosity modifying agents.

SIC Code: 2869

II. Regulatory Cross-Reference

REGULATORY CROSS-REFERENCE

40 CFR 112.7 GENERAL REQUIREMENTS

The Painesville facility was evaluated for the substantial harm criteria identified in 40 CFR § 112.20 (e) and (f). The Certification of the Applicability of the Substantial Harm Criteria is provided in Attachment 7. The facility was found to have a total oil storage capacity of greater than one million gallons and is located at a distance from Blackbrook Creek, which is a watershed for the Mentor Marsh, which then flows into Lake Erie such that a discharge could cause injury to fish, wildlife, and sensitive environmental areas. As a result of this determination, a Facility Response Plan (FRP) was prepared in accordance with 40 CFR § 112.20.

112.7 (a)(1)

This facility is in conformance to the SPCC Regulations that are effective August 17, 2002.

112.7 (a)(2)

In complying with applicable requirements of the SPCC Regulation, the Painesville facility is deviating from the requirements of 112.8(c)(8)(v) to perform regular testing of liquid level sensing devices. Instead, the Painesville facility inspects and records bulk storage tank levels twice per day; readings are compared to those taken previously and any discrepancies are investigated. Therefore, any spill occurring for any reason (including the failure of the liquid level system) would be quickly discovered.

112.7 (a)(3)

See Attachment 1, the Facility Site Location Map for the location of the facility and the surrounding area. Attachment 2, The Facility Diagram – Container and Transfer Locations depicts SPCC units including transfer stations and connecting pipes as well as storm water drain inlets and flow (slope) directions of rain water (and spilled oil paths). See Facility Description in Section III for detailed information on the facility and Section IV for detailed information on the SPCC units.

112.7 (a)(3)(i)

The facility maintains an electronic inventory of all bulk storage tanks that list the capacity and current contents. This can be found on the Painesville intranet at:

j:\OPRData\Environmental\Environmental & Technical\SPCC\04SPCCdata(Main Copy).xls

An *example* of this table has been provided for reference in Attachment 11 (Note: the electronic version always supersedes the version presented in this Plan). Procedures for changing storage tank service are documented in work instruction Q.S. No. 03-4.15-300-1021. Procedures call for electronic notification of appropriate personnel for changes in tank service to include tank number, contents, the new safe tops calculation and NFPA H-F-R code for labeling the tank.

Additionally, tank inventory logs with contents and current inventory are maintained by the operators in each area and are filled out twice daily. These can be found on the Painesville intranet at:

j:\OPRData\PVReference\Night Sheets

Information on electrical transformers and fuel tanks associated with emergency generators is shown in Attachment 10.

As the Painesville facility is fundamentally an oil processing operation, end products typically are containerized (e.g., drummed) for subsequent sale to customers. These are stored in multiple staging locations throughout the facility (see Attachment 2) and ultimately centralized at the shipping warehouse. All drums are required to be appropriately labeled for both material identification and hazard communication.

Finally, mobile equipment containing petroleum-based products (e.g., motor oil, diesel fuel, hydraulic fluid) over volumetric threshold limits are present on site. A current inventory of Lubrizol-owned mobile equipment is available on the computerized maintenance management system on the Painesville facility intranet.

112.7 (a)(3)(ii)

Discharge prevention measures are discussed for each specific unit in Section IV. Written procedures cover the loading and unloading of materials and the transfer of materials within the facility. Documented work instructions are accessible to all employees through the Painesville site on the Lubrizol intranet. These work instructions cover the following:

- Q.S. No. 03-4.9.1-361-2202 Requesting and Completing a Transfer in an Area
- Q.S. No. 03-4.9.1-361-2200 Requesting and Completing a Transfer Out of an Area
- Q.S. No. 03-4.9.1-361-2060 Unloading Tank trucks
- Q.S. No. 03-4.9-361-2050 Loading Tank Trucks
- Q.S. No. 03-4.9-361-2328 Unloading Tank Cars
- Q.S. No. 03-4.9-361-2210 Loading Tank Cars
- Q.S. No. 03-4.9-361-2056 Exceeding Safe Tops in Storage Tanks

Tank farms are inspected twice daily as discussed in documented work instruction Q.S. No. 03-4.15.3-361-1026. Copies of the inspection forms are maintained electronically (Plant Documents Lookup System) on the Lubrizol intranet and are kept for a minimum of three years.

112.7 (a)(3)(iii)

Discharge and drainage controls for each unit are discussed in Section IV. Drainage of these containment areas is to the process wastewater pretreatment system. Surface drainage at the facility is engineered so that oil spilled outside diked or curbed areas will drain into the process/storm sewer and be sent to the process wastewater pretreatment system. See Attachment 3, Plant Wide Sewer Layout and Attachment 4, Flow Diagram for Waste Treatment and Spill Containment.

112.7 (a)(3)(iv)

The plant-wide emergency alarm system is activated when a spill occurs that requires immediate response of the trained in-plant Emergency Response Organization (ERO). Spill kits are utilized to clean-up minor spills and are located around the facility in areas where transfer activities occur. Additional spill containment sorbents and booms are located in the HazMat trailer that can be deployed anywhere in the facility. Clean-up contractors are utilized to clean-up large spills.

112.7 (a)(3)(v)

Disposal of spilled residues and clean-up materials will be in accordance with applicable legal requirements. The Plant Services Superintendent is responsible for determining the proper disposal options. The *Waste Management Guidelines* manual, accessible on the Lubrizol intranet, discusses the details of packaging and labeling waste containers.

112.7 (a) (3) (vi)

Emergency outside contacts are in Tab 14 of the Emergency Response Plan. Emergency phone numbers include the National Response Center, appropriate Federal, State and local agencies and cleanup contractors.

12.7 (a)(4)

The form for reporting a discharge is in Section 1.3.1 of the Painesville facility's FRP in accordance with 40 CFR § 112.20. A sample of the Spill Response Notification Form for emergency events is in Attachment 6.

112.7 (a)(5)

The procedures to be used when a discharge occurs are in Tab 16 of the Emergency Response Plan. Contact with these agencies is made by the Emergency Response Coordinator or person(s) he designates.

40 CFR 112.7 (b) POTENTIAL EQUIPMENT FAILURES RESULTING IN SPILLS

Lubrizol's operating procedures and preventive maintenance program minimize the potential for releases. The tank farms have secondary containment. The storm sewer system in the plant flows to a basin that is equipped with an oil skimmer. Storm waters are normally pumped back to the process sewer pretreatment plant or directly to the Painesville POTW if the water quality standards of our discharge permit are met. Valving in the storm water system allows for isolation of sections of the system should a spill occur. A wastewater operator, trained in oil spill handling/prevention and valve isolation, is present 24 hours per day, seven days each week.

40 CFR 112.7 (c)(1) CONTAINMENT AND DIVERSIONARY STRUCTURE

112.7 (c)(1)(i)

Sufficiently impervious (clay or concrete) dikes enclose Teen, 100, 200, 300, 400, 500, 600, 700, 800 and W-tank farms to contain spilled oil. Drainage of the tank farms is controlled by valves to the process sewer pretreatment system. These valves are kept closed except during draining the tank farm of stormwater when an operator is present.

112.7 (c)(1)(ii)

Loading and unloading area for tank trucks and tank cars is curbed or serviced by existing drainage systems to provide containment, retention and oil removal. See reference to procedures for loading and unloading in 112.7(a)(3)(ii).

112.7 (c)(1)(iii)

Surface drainage at the facility is engineered so that oil spilled outside diked or curbed areas at the facility will drain into the process/storm sewer and pass through the process wastewater pretreatment system. There are eight (8) shutoff valves located strategically throughout the storm water system which can be used to contain spills should they occur. There is also a 54" slide gate valve on Blackbrook Creek at the point where the Creek exits the plant. This valve allows for quick isolation of Blackbrook Creek should a spill occur in the facility that is not captured in the existing storm water basin. This would include:

- Area in front of and along the shipping warehouse, Freedom Road and the employee parking lots;
- Railroad marshalling yard;
- Vehicle rollover down embankment from Rt. 44.

The valve allows for quick, complete isolation or it can be partially closed and act as a weir, to keep insoluble oil products back behind it. The installation of a valve was approved by the Army Corp of Engineers with the understanding this valve must be kept open except during an actual emergency situation.

Both the storm basin and the process sewer systems are equipped with oil/water separators. Details on this equipment are in Attachment 5.

The worst case discharge would be the loss of containment on the facility's largest oil storage tank. The storage tank has a capacity of one million gallons. It is located within a secondary containment dike which is capable of holding the entire contents plus sufficient freeboard for precipitation. In addition, this tank and associated tank farm are located within the boundaries of the facility's storm water drainage system. Thus, if a breach would occur in the secondary containment the storm water drainage system would still be available to retain spilled material on-site.

Storage of the spilled material could take place at the Painesville facility. The process sewer treatment system has the capacity to hold 1.5 MM gallons of material in two surge tanks and there are typically a minimum of twenty (20) 20,000 gallon empty tank cars on-site which could be used in case of an emergency.

112.7 (c)(1)(iv)

Booms, drain blockers and absorbent materials are provided in the HazMat vehicle, spill response trailer and emergency spill equipment containers located strategically throughout the facility. See Section 1.9, Diagram 4 of the facility's FRP for diagrams of response equipment locations. Various size inflatable sewer plugs also are carried in the spill response trailer. A sand pile is maintained near the storm water/Blackbrook Creek

discharge point of the plant that can be used to create an underflow or overflow dam in the open ditches.

40 CFR 112.7 (d) DEMONSTRATION OF PRACTICABILITY

Facility management has determined that use of containment and diversionary structures or readily available equipment to prevent discharged oil from reaching navigable waters is practical and effective at this facility. Members of the Emergency Response Organization (ERO) are on site 24 hours per day, seven days per week. ERO members are trained annually on spill response. In addition, outside clean-up companies can be called upon for assistance with both manpower and equipment. Contact information for outside clean-up companies is located in Tab 14 of the Emergency Response Plan.

40 CFR 112.7 (e) INSPECTIONS AND RECORDS

Tank farms are inspected twice daily as discussed in documented work instruction Q.S. No. 03-4.15.3-361-1026. Copies of the inspection forms are maintained electronically on the Lubrizol intranet (<http://lz/plantdocuments/pvmain.aspx>). These inspections include the condition of the tanks, pads, pumps, pipe racks, dike and ground area, looking for spills and leaks, checking level, pressure and temperature measuring devices where they exist and checking dike valves.

Drums and totes are inspected weekly and documented on hard copy safety inspection forms retained by the Manufacturing Superintendents:

- o Building 12: J:\OPRData\PVOperations\Manufacturing\Safety\Other Procedures_Forms\12 Building Weekly Safety Checklist.doc
- o Building 5/6/46: J:\OPRData\PVOperations\Manufacturing\Safety\Other Procedures_Forms\5-6-46 Weekly Safety Check.DOC
- o Building 20/21: J:\OPRData\PVReference\IPT Forms\BLD20\Other Documents\Bldg 20 Safety Checklist.doc
- o Building 73 (Blend Area): J:\OPR Shared\bldg.73safety inspection\Bldg 73 Inspection Form.doc
- o Building 43: J:\OPRData\PVReference\IPT Forms\BLD43\Other Documents\Acid Plant Safety Equipment Inspection.DOC
- o Building 40: J:\co3900\PROCEDURES AND FORMS\Weekly Drum Container Storage.xls
- o Track: J:\OPRData\PVReference\Mfg Doc\Tank Farm Scale House\Track Reference Book\Safety Insp 200 TF and CD Track.doc

Transformers and generators are checked monthly under a preventive maintenance (PM) program.

Inspection and test reports records are maintained for a minimum of three years.

40 CFR 112.7 (f) PERSONNEL TRAINING AND SPILL PREVENTION PROCEDURES

112.7 (f)(1)

Oil handling personnel have been instructed by management in the operation and maintenance of equipment to prevent discharges, to follow discharge procedure protocols and general facility operations, and to understand the contents of the SPCC Plan. Refresher training is given annually. Oil pollution prevention training is administered by the Painesville facility's Environmental, Health and Safety department. Training records are maintained in the Human Resources electronic database for a minimum of three years.

112.7 (f)(2)

The facility General Manager is accountable for oil spill prevention at Painesville facility.

112.7 (f)(3)

As needed, scheduled briefings covering regulations, operation and maintenance of equipment necessary to prevent and contain spills are held. Procedures for response, notification and clean-up are stressed. Proper communication techniques are stressed. Training of ERO personnel using review of written procedures and familiarization with equipment are covered annually. Hands-on deployment of spill control equipment is conducted periodically during ERO training.

40 CFR 112.7 (g) SECURITY

112.7 (g)(1)

The handling, processing and storage areas of the Painesville facility are fully fenced including barbed wire atop the fence. Access for vehicles and personnel is by way of two entrances controlled and monitored by plant security. The perimeter is posted denying access to unauthorized personnel in accordance with 40 CFR 265.14 RCRA. Security coverage is provided 24 hours per day, 365 days per year. Security cameras, controlled from the main guard house, monitor various areas of the plant. Perimeter checks are made by security personnel daily.

112.7 (g)(2)/(3)

Tank valves are closed and pumps are shutoff when not in use. The Painesville facility operates 24 hours per day, 365 days per year and personnel are always present within the fenced facility.

112.7 (g)(4)

The loading and unloading connections of oil pipelines are capped when not in service or when in standby service for an extended time (more than 6 months).

112.7 (g)(5)

Facility lighting is commensurate with the type and location of the facility. Consideration has been given to (i) discovery of spills occurring during hours of darkness, both by operating personnel and by non-operating personnel and (ii) prevention of spills occurring through acts of vandalism.

40 CFR 112.7 (h) TANK CAR AND TRUCK LOADING / UNLOADING RACKS

112.7 (h)(1)

Loading/unloading facilities are bounded by the existing plant drainage systems (process/storm sewer) which provide containment, retention and organic removal. Both systems provide for containment in sufficient volume to contain any leaks/spills from tank car and tank truck sources. The storm water basin can be pumped directly back to the process wastewater pretreatment system or it can be pumped directly to the POTW if the water quality standards of our discharge permit are met. Shutoff valves located strategically throughout the storm water system can be used to isolate spills should they occur.

112.7 (h)(2)

Tank cars are blocked from switching by derailleurs securing the branch lines for loading/unloading stations. Wheel chocks are used on tank trucks.

112.7 (h)(3)

Prior to filling and departure of any tank car or tank truck, the lowermost drain and all outlets of such vehicles are examined for leakage, and if necessary, tightened, adjusted, or replaced to prevent liquid leakage while in transit. See reference to procedures for loading and unloading in 112.7(a)(3)(ii).

40 CFR 112.7 (i) BRITTLE FRACTURE EVALUATION REQUIREMENTS

Field constructed above ground storage containers shall be tested as required by this section and in accordance with API 653, Section 3. The facility maintains an electronic inventory of all bulk storage tanks that list the last time the tank was inspected. This can be found on the Painesville intranet at:

j:\OPRData\Environmental\Environmental & Technical\SPCC\04SPCCdata(Main Copy).xls

An example of this table has been provided for reference in Attachment 11.

40 CFR 112.7 (j) CONFORMANCE WITH STATE REQUIREMENTS

The Lubrizol Painesville adheres to all state required inspection standards as contained in OAC 1301:7-7-28 and OFC FM-2801.3.3. Tanks are visually inspected at a minimum each time the container is filled for signs of leaks, deterioration of the tank, dike or support foundation, and accumulation of material within the dike area.

In the event of a spill or release the appropriate local and state agencies will be notified as required and referenced in 112.7(a)(3)(vi) and 112.7(a)(5).

40 CFR 112.8 (a) GENERAL REQUIREMENTS

The general requirements for the Plan under the regulation have been met.

40 CFR 112.8 (b) FACILITY DRAINAGE

112.8 (b)(1)

Drainage from diked storage areas is positively controlled by gate valves to prevent a spill or other excessive leakage of oil into the drainage system. Diked areas are drained via manual valves to the process sewer where drainage waters are treated in the process wastewater pretreatment system before being discharged to the Painesville POTW. See Attachment 3, Plant Wide Sewer Layout.

112.8 (b)(2)

Valves used for the drainage of diked areas are manual, open-and-closed design (gate valve). Secondary containment for tank farms drain to the facility's process sewer where drainage waters are treated in the process wastewater pretreatment system before being discharged to the POTW.

112.8 (b)(3)

Plant drainage systems from undiked areas, process vessels and transfer areas can be controlled by means of positive shutoff gate valves on drain lines in the process sewer system and storm drainage system. These systems are contiguous to the process wastewater pretreatment systems equalization tanks into which a leak or spill may be diverted using manual pumping stations. See Attachment 4, Mechanical Flow Diagram for Waste Treatment and Spill Containment. The storm water basin is pumped directly back to the process wastewater pretreatment system or it can be pumped directly to the POTW if the water quality standards of our discharge permit are met.

112.8 (b)(4)

Facility drainage is designed to divert leaks or spills to the process sewer. See Attachment 3, Plant Wide Sewer Layout.

112.8 (b)(5)

Facility drainage systems are adequately engineered to prevent oil from reaching navigable waters in the event of equipment failure or human error at the facility.

40 CFR 112.8 (c) BULK STORAGE TANKS

112.8 (c)(1)

Material and construction of bulk tanks used for storage of oil are compatible with the nature of the materials stored. Rupture protection is provided for by both vent sizing and construction to appropriate specifications. Tanks are designed and constructed to meet applicable requirements, including;

- OSHA specifications for flammable and combustible liquids,
- API standards for tanks based on service and pressure rating, and
- Standards acceptable to the Ohio Division of State Fire Marshall for flammable and combustible materials storage.

112.8 (c)(2)

Bulk storage tank installations in tank farms are constructed so that a secondary means of containment is provided for the entire contents of the largest single tank plus sufficient freeboard to allow for precipitation.

112.8 (c)(3)

Drainage from diked storage areas is positively controlled by gate valves to prevent a spill or other excessive leakage of oil into the drainage system. Diked areas are drained via manual valves to the process sewer where it is treated in the process wastewater pretreatment system before being discharged to the POTW. Valves are normally closed and are opened only when an operator is present. See Attachment 3, Plant Wide Sewer Layout.

112.8 (c)(4)

There are no completely buried metallic storage tanks at the facility.

112.8 (c)(5)

There are no partially buried tanks at the facility.

112.8 (c)(6)

Integrity testing of applicable AST's shall be conducted on a regular schedule as identified in API 653, Section 4, and whenever material repairs are made, such as major repairs, alterations or reconstruction. Visual inspections will be combined with another testing technique such as hydrostatic testing, radiographic testing, ultrasonic testing, acoustic emissions testing, or another system of nondestructive shell testing. The facility also maintains an electronic inventory of all bulk storage tanks that lists the last inspection date. Detailed inspection reports and comparison records are kept electronically to document the inspections. Several factors must be considered to determine inspection intervals for additional testing of tank integrity. These include, but are not limited to, the following:

- Nature of product stored
- Results of visual maintenance checks
- Corrosion allowances and corrosion rates
- Corrosion prevention systems
- Conditions of previous inspections
- The methods and materials of construction and repair
- The location of the tank
- The potential risk of air or water pollution
- Leak detection systems
- Change in operating mode (e.g., frequency of fill cycling)
- Changes in service
- Jurisdictional requirements

Integrity testing schedules for Lubrizol bulk storage tanks are summarized in Attachment 11. These were developed utilizing engineering judgment based on knowledge of the plant, available tank information and the following industry standards:

- API Standard 653, "Tank Inspection, Repair, Alteration, and Reconstruction"
- API recommended Practice 575, "Inspection of Atmospheric and Low-Pressure Tanks"
- Steel Tank Institute Standard SP001-00-03, "Standard for Inspection of In-Service Shop Fabricated Aboveground Tanks for Storage of Combustible and Flammable Liquids"

The timing for bulk storage tank integrity testing follows guidelines proposed in API Standard 653. All bulk storage tanks listed in Attachment 11 should be tested by the end of 2014. Integrity testing schedules may be modified to coincide with production logistics and/or financial considerations.

Lubrizol utilizes shop-fabricated drums for storage of various petroleum-based products. The drum management program employs visual inspection with good engineering practice to insure the integrity of drums utilized throughout the facility consisting of, but not limited to:

- Weekly documented drum storage area inspections
- Indoor storage to minimize corrosion from precipitation
- Drum pallets to avoid direct contact with the ground

Drums exhibiting signs of corrosion or other deterioration are removed from service and replaced. Based on the procedures in place as part of the drum management program, container integrity testing for drums is not necessary.

Lubrizol also utilizes totes for storage of petroleum-based products. Totes generally are changed out frequently, rather than filled from bulk containers. Similar to drums, Lubrizol employs visual inspection with good engineering practice to insure the integrity of totes utilized throughout the plant consisting of, but not limited to:

- Weekly documented tote storage area inspections
- Indoor storage to minimize corrosion from precipitation

Totes exhibiting signs of corrosion or other deterioration are removed from service and replaced. Totes that are used over and over for extended periods of time are sent out for inspection every three years.

112.8 (c)(7)

To control leakage through defective internal heating coils, the following is applied: All storage tanks with heating (coils or heat exchangers) are connected to a condensate return system with the northern and southern portions of the plant conveyed separately. This system is continuously monitored by conductivity meters for reuse of condensate. In addition, on every shift (12 hours) the operators bring samples from each of the individual condensate pots to boiler house for testing by the Utilities Department. Testing includes conductivity, pH and a visual observation for contaminants. Condensate which does not meet standards is discharged to the process sewer where it is pretreated before being discharged to POTW.

112.8 (c)(8)

Direct communication between tank operator and pumping section occurs before transfer of material takes place. Confirmation is made by the operator that the tank will be able to hold the entire amount being transferred. Maximum tank capacity for filling is 90% of volume. Documented work instruction Q.S. 03-4.9-361-2056 discusses the procedure to

use when it is necessary to exceed 90% of the tank volume. Each storage tank is equipped with a fast response system for determining the liquid level.

112.8 (c)(9)

Plant effluents are not discharged into navigable waters. All process-contaminated waters are discharged to the City of Painesville Waste Water Treatment Plant after pre-treatment as required by facility operating permit # IDP-3. An effluent operator is present at the facility 24 hours per day, seven days a week and inspects the effluent treatment area every 2 hours.

112.8 (c)(10)

Oil leaks which result in a loss of oil from the container, including but not limited to seams, gaskets, piping, pumps, valves, rivets and bolts are promptly repaired. Necessary maintenance repairs are given a priority sufficient to minimize discharged spill events. Any accumulated oil is cleaned up and properly disposed.

112.8 (c)(11)

Portable oil storage containers (drums and totes) are kept on impervious surfaces where any discharge would be contained within the sewer system.

Mobile equipment is staged as follows:

- Tank trucks are temporarily staged on impervious surfaces where any discharge would be contained within the sewer system.
- Tank cars are staged over rail beds that have ballast drains underneath them. These ballast drains flow to the storm water basin so that any discharge would be contained within the sewer system.

40 CFR 112.8 (d) TRANSFER OPERATIONS, PUMPING, AND IN-PLANT PROCESSES

112.8 (d)(1)

There are no underground process lines at the facility in oil service. Any future piping installed below grade for oil service will be provided with protective wrapping and coating and cathodically protected. Integrity and leak testing of oil service buried piping will be conducted at the time of installation and following any modification, relocation or replacement.

112.8 (d)(2)

Pipelines that are identified as no longer in service (out of service more than 6 months) are drained and capped or blind-flanged.

112.8 (d)(3)

Pipe supports are properly designed to minimize abrasion and corrosion and allow for expansion and contraction.

112.8 (d)(4)

All tanks are inspected once per shift. These inspections include the condition of the tanks, pads, pumps, pipe racks, dike and ground area. See reference to procedures for inspections in 112.7(a)(3)(ii) and 112.7(e).

112.8 (d)(5)

Road traffic is directed along specific roadways. Above-ground piping in racks has clearance of 14 feet. Department of Transportation regulations prohibit common carriers from exceeding 13'6". Special oversize vehicles are directed by special routing using an individual escort.

III. Facility Description

The Lubrizol Corporation (Lubrizol) is a specialty chemical company headquartered in Wickliffe, Ohio. The Painesville facility is one of the Corporation's main domestic production facilities and is engaged in the manufacture of lubricant additives, fuel additives, metal working fluids and other specialty chemicals.

The Painesville facility employs management practices that, under normal operating conditions, preclude the exposure of "significant" materials to storm water. However, the facility does employ and manufacture a number of significant materials which may be treated and/or stored on-site. These materials include: lubricant and fuel additives, hydrocarbon oil, xylene, alcohols, solvents, organic and inorganic acids, mineral spirits, hazardous and non hazardous aqueous wastes, hazardous and non hazardous organic waste, ash and solid waste/trash consisting of scrap wood, packing materials, empty containers, metal, and waste paper. Although solid waste generally does not contain significant materials, it is included here in the unlikely event that it may contain such materials.

Method of Treatment, Storage, or Disposal

All of the above materials, except solid waste/trash, are or have been stored in closed tanks and containers. The solid wastes are stored in metal hoppers with lids. None of these materials have been treated or disposed in a manner which allows exposure to storm water during the past three years.

Material Management Practices

Materials management practices which have been employed to minimize contact of significant materials with storm water runoff include:

General:

- Employee training to minimize contact of significant materials with storm water.
- Preventive maintenance programs on equipment used in storage and/or treatment of significant materials.
- Handling materials in closed systems.
- Manufacturing and use of materials indoors or over containment areas as much as possible.
- Storage of materials indoors or within containment areas protected from storm water runoff as much as possible.

- Emphasis on housekeeping practices to keep all areas of the facility clean with special emphasis on areas where materials are frequently handled.
- Frequent inspections of storage and material loading/unloading areas.
- Immediate cleanup of spills. Applicable categorical waste water pretreatment standards require extreme care be taken in handling any materials which may contain regulated chemicals. This emphasizes the importance of housekeeping and spill cleanup.

Bulk Storage:

Materials are generally stored in tanks equipped with impervious dikes and/or berms or spill pads. Double-walled tanks are also used. Diking consists of a concrete floor or clay base and concrete or earthen walls. Rain water collected in tank farms drain only to the facility effluent pretreatment system. The facility's hazardous waste storage unit is located within a concrete containment area and the concrete is also coated with an impervious lining. Inspections of the entire RCRA treatment system are conducted daily and documented. All other tank farms are inspected daily as part of the routine operation of the facility.

Drum Storage:

Drums are stored both inside and outside buildings at the Painesville facility. Those materials stored outside are either: (1) partially covered by a roof and/or (2) located on impervious spill pads. In addition, drums may be staged outdoors for short periods of time on wooden pallets. All areas are observed several times daily, are typically close to operating areas and are located in areas where spills would be collected in the facility's sewer systems (see control measures under outfall #2 below for a description of the sewer system).

Hopper Storage:

Small hoppers (1-4) cubic yards are located throughout the facility in operating areas. These hoppers are generally placed inside buildings on paved bases when in use. Once brought down to the central waste storage area they are covered. Large hoppers (20-40 yards) are generally covered to prevent infiltration of precipitation. Ash is collected/stored in specifically designed covered boxes to minimize dust problems and prevent storm water contact.

Materials Loading and Access Areas

Material loading areas for drums are typically indoor loading docks. Bulk material loading areas and access routes generally have paved bases. Bulk loading areas are typically secondarily contained. Additional containment protection is provided by the facility's sewer systems as described below.

Control Measures

Control measures include: drainage of diked areas, tank farm and pipe rack inspections, transfer operations and overload protection, DOT loading and unloading requirements, spill handling procedures, and emergency preparedness and contingency plans. The entire facility is covered by an on-site emergency alarm system. An on-site, 24-hour emergency response team is available to implement the SPCC plan. Facility supplies include spill kits located strategically throughout the facility, a HazMat vehicle and a spill response trailer equipped with booms and plugs for hazardous materials type incidents. See Section 1.9, Diagram 4 of the facility's FRP for diagrams of response equipment locations.

Outfall 001

Outfall 001 is located along the northern edge of the facility and drains the area identified as drainage basin #1 in Attachment 8. This drainage basin encompasses primarily employee parking lots, administration buildings and the shipping warehouse. The shipping warehouse is a paved area and involves only indoor loading dock type activities (drums and other small containers). No tank cars or tank trucks are loaded in this area. Outfall 001 drains into Blackbrook Creek.

Outfall 002

Outfall 002 is located in the northwest corner of the facility and covers drainage basins 2 and 3 as shown on Attachment 8. Drainage basin #2 encompasses predominantly grassy/wooded areas, employee parking lots, and administration areas. There are no structural controls on drainage basin #2 and the area is generally classified as non-industrial.

Drainage basin #3 covers the operating portion of the facility and the majority of the acreage shown on Attachment 8. There are three separate sewer systems within this drainage basin: process, sanitary and storm. The process water goes to an on-site effluent pretreatment system which then combines with the sanitary prior to discharge to the city waste water treatment plant (POTW). All storm water is directed via natural contours and strategic dikes and berms to the facility's storm water basin located in the northwest corner of the facility. The storm water is conveyed through separate ditches and pipes to the storm water basin. There are eight (8) shutoff valves located strategically throughout the storm water system which can be used to contain spills should they occur. The storm water basin is concrete lined and equipped with an oil skimmer and under-flow weirs. The basin is equipped with two pumps, one high volume, which are used to pump the storm water to the facility's pretreatment system as capacity permits. The alternative is to pump directly to the POTW. Heavy rain events may require releasing some storm water to Blackbrook Creek. In the past four years (as of 10/09) the storm water basin has

discharged waters to Outfall 002 only once, during the 100-year flood event during the summer of 2006. During a rain event the first flush (minimum of 30 minutes) goes to the facility's pre-treatment system. The effluent system operators make daily inspections of the basin. All the previously mentioned management practices apply to storm water reaching this basin. Outfall 002 drains to Blackbrook Creek.

Outfalls 003, 004 and 005

These outfalls are essentially identical in nature and source from predominantly grass/wooded areas. There are no specific structural controls in this largely undeveloped area. Discharges from these outfalls are not associated with industrial activity. These outfalls drain to Blackbrook Creek.

IV. Unit Specific Information

UNIT SPECIFIC INFORMATION

(Refer to Attachment 2 for locations)

A. 100 T/F-East

- Capacity of largest tank: 12,200 gallons
- Containment capacity: 39,000 gallons
- Tank contents: Oil materials
- Wall material: Concrete
- Floor material: Concrete
- Drainage: To process sewer (valve normally closed)

B. 100 T/F-West

- Capacity of largest tank: 88,000 gallons
- Containment capacity: 140,000 gallons
- Tank contents: Oil materials
- Wall material: Concrete
- Floor material: Concrete
- Drainage: To process sewer (valve normally closed)

C. 200 T/F

- Capacity of largest tank: 503,000 gallons
- Containment capacity: 961,000 gallons
- Tank contents: Oil materials
- Wall material: Concrete/earthen
- Floor material: Concrete/earthen
- Drainage: To process sewer (valve normally closed)

D. 300 T/F-West

- Capacity of largest tank: 1,015,000 gallons
- Containment capacity: 1,248,000 gallons
- Tank contents: Oil materials
- Wall material: earthen
- Floor material: earthen
- Drainage: To process sewer (valve normally closed)

E. 300 T/F - NE

- Capacity of largest tank: 30,000 gallons
- Containment capacity: 93,000 gallons
- Tank contents: Oil materials
- Wall material: Earthen
- Floor material: Earthen
- Drainage: To process sewer (valve normally closed)

F. 400 T/F

- Capacity of largest tank: 169,000 gallons
- Containment capacity: 601,000 gallons
- Tank contents: Oil materials
- Wall material: Concrete/Earthen
- Floor material: Earthen
- Drainage: To process sewer (valve normally closed)

G. 500 T/F - North

- Capacity of largest tank: 26,000 gallons
- Containment capacity: 143,000 gallons
- Tank contents: Oil materials
- Wall material: Concrete
- Floor material: Concrete
- Drainage: To process sewer (valve normally closed)

H. 500 T/F - South

- Capacity of largest tank: 26,000 gallons
- Containment capacity: 169,000 gallons
- Tank contents: Oil materials
- Wall material: Concrete
- Floor material: Concrete
- Drainage: To process sewer (valve normally closed)

I. 600 T/F - East

- Capacity of largest tank: 173,000 gallons
- Containment capacity: 211,654 gallons
- Tank contents: Oil materials
- Wall material: Concrete/Earthen
- Floor material: Concrete
- Drainage: To process sewer (valve normally closed)

J. 600 T/F - West

- Capacity of largest tank: 230,000 gallons
- Containment capacity: 252,000 gallons
- Tank contents: Oil materials
- Wall material: Earthen/Concrete
- Floor material: Earthen/Concrete
- Drainage: To process sewer (valve normally closed)

K. 700 T/F - West

- Capacity of largest tank: 30,500 gallons
- Containment capacity: 34,200 gallons
- Tank contents: Oil materials
- Wall material: Acid resistant brick
- Floor material: Acid resistant brick
- Drainage: To process sewer (valve normally closed)

L. 700 T/F - North

- Capacity of largest tank: 149,000 gallons
- Containment capacity: 181,000 gallons
- Tank contents: Oil materials
- Wall material: Concrete
- Floor material: Concrete
- Drainage: To process sewer (valve normally closed)

M. 800 T/F

- Tank farm is out of service
- Capacity of largest tank: 36,000 gallons
- Containment capacity: 289,000 gallons
- Tank contents: Empty
- Wall material: Earthen
- Floor material: Earthen/Concrete
- Drainage: To process sewer (valve normally closed)

N. W - T/F

- Capacity of largest tank: 50,000 gallons
- Containment capacity: 93,000 gallons
- Tank contents: Oil materials
- Wall material: Concrete (epoxy coated)
- Floor material: Concrete (epoxy coated)
- Drainage: To process sewer (valve normally closed)

O. Teen T/F

- Capacity of largest tank: 179,000 gallons
- Containment capacity: 209,000 gallons
- Tank contents: Oil materials
- Wall material: Earthen
- Floor material: Earthen
- Drainage: To process sewer (valve normally closed)

P. Bldg. 20 Process Area

- Tanks designated with letter "D"
- Process Unit consists of both indoor and outdoor process vessels or equipment and storage tanks, total = 63
- Capacity of largest tank: 25,423 gallons
- Tank contents: Oil materials
- Floor material: Concrete
- Drainage: To process sewer (in building and outside doorways) or storm sewer basin (in roadway)

Q. Bldg. 21 Process Area

- Tanks designated with letter "J"
- Process Unit consists of both indoor and outdoor process vessels or equipment and storage tanks, total = 87
- Capacity of largest tank: 10,070 gallons
- Tank contents: Oil materials
- Floor material: Concrete
- Drainage: To process sewer (in building and outside doorways) or storm sewer basin (in roadway)

R. Bldg. 43 Process Area

- Tanks designated with letter "K"
- Process Unit consists of process vessels or equipment and storage tanks, total = 59
- Capacity of largest tank: 12,195 gallons
- Tank contents: Oil materials
- Floor material: Concrete
- Drainage: To process sewer (in building and outside doorways) or storm sewer basin (in roadway)

S. Bldg. 62 Process Area

- Tanks designated with letter "L"
- Process Unit consists of process vessels or equipment and storage tanks, total = 31
- Capacity of largest tank: 26,000 gallons
- Tank contents: Oil materials
- Floor material: Concrete
- Drainage: To process sewer (in building and outside doorways) or storm sewer basin (in roadway)

T. Bldg. 10/73 Process Area

- Tanks designated with letter "E"
- Process Unit consists of process vessels or equipment and storage tanks, total = 63
- Capacity of largest tank: 26,000 gallons
- Tank contents: Oil materials
- Floor material: Concrete
- Drainage: To process sewer (in building and outside doorways) or storm sewer basin (in roadway)

U. Bldg. 18 Drum Packing/Storage Area

- Drum Packing and Storage
- Drum storage: Large stock of drums stored inside Bldg. 18
- Container contents: Oil materials
- Floor material: Concrete
- Drainage: No drains in building; leaking drum would most likely not migrate outside to storm sewer basin (in roadway)

V. Bldg. 5/6/46 Process Area

- Tanks designated with letter "A"
- Process Unit consists of process vessels or equipment and storage tanks, total = 47
- Capacity of largest tank: 12,000 gallons
- Tank contents: Oil materials
- Floor material: Concrete
- Drainage: To process sewer (in building and outside doorways) or storm sewer basin (in roadway)

W. Bldg. 12 Process Area

- Tanks designated with letter "F" and "G"
- Process Unit consists of process vessels or equipment and storage tanks, total = 54
- Capacity of largest tank: 13,200 gallons
- Tank contents: Oil materials
- Floor material: Concrete
- Drainage: To process sewer (in building and outside doorways) or storm sewer basin (in roadway)

X. Bldg. 2 Boiler Area

- Tanks designated with letter "C"
- Process Unit consists of process vessels or equipment and storage tanks, total = 21
- Capacity of largest tank: 7,300 gallons
- Tank contents: Oil materials
- Floor material: Concrete
- Drainage: To process sewer (in building and outside doorways) or storm sewer basin (in roadway)

Y. Bldg. 63 Locomotive Storage Bldg.

- Drum storage: 4 drums
- Container contents: Oil lubricant materials
- Floor material: Concrete
- Drainage: To floor and possibly out overhead door into gravel

Z. Bldg. 61 Quality Assurance Lab

- Drum storage: Approximately 20 drums inside
- Container contents: Oil materials and solvents
- Floor material: Concrete
- Drainage: Floor to roadway to storm sewer

AA. Bldg. 25/25A Receiving and Central Stores Bldg.

- Drum storage: large stock of drums stored inside receiving
- Container contents: Oil materials
- Floor material: Concrete
- Drainage: No drains in building; leaking drum would most likely not migrate outside to storm sewer basin (in roadway)

BB. Bldg. 68 Shipping Warehouse

- Drum storage: large stock of drums stored in shipping (capacity approximately 19,000 drums)
- Container contents: Oil materials
- Floor material: Concrete
- Drainage: To process sewer (valve normally closed) in flammable storage area. Rest of building does not have drains, leaking drum most likely would not migrate outside to storm sewer (in roadway)

CC. Bldg. 34 Maintenance Bldg.

- Drum storage: Approximately 10 drums inside
- Container contents: Oil materials (lubrication/hydraulic fluids)
- Floor material: Concrete
- Drainage: No drains; leaking drum would most likely would not migrate outside to storm sewer basin (in roadway)

DD. Bldg. 48 Maintenance Storage Bldg.

- Drum storage: Approximately 4 drums stored inside
- Container contents: Used oil
- Floor material: Concrete
- Drainage: No drains; leaking drum would most likely would not migrate outside to storm sewer basin (in roadway)

EE. Lab Waste Tank.

- Container contents: Waste oil materials
- Capacity: 900 gallons
- Floor material: Concrete, 2" curb
- Drainage: To storm sewer in roadway
- Portable tank is equipped with high level alarm that cuts off pumping into container

FF. S-7 Organic Skim Tank for WWTP.

- Container contents: Oil materials skimmed from process sewer
- Capacity: 2100 gallons
- Floor material: Concrete/Epoxy coated
- Drainage: Secondary containment drains back into process sewer vault

GG. Gasoline Storage Tank

- Outdoor gasoline storage tank (elevated) 730 tk
- Capacity: 400 gallons
- Container contents: Gasoline
- Floor material: Concrete diked
- Drainage: Secondary containment valve drains to roadway storm sewer (valve normally closed)

HH. Oil Skimmer Tote

- Container contents: Oil skimmed from stormwater basin
- Container Capacity: 330 gallons
- Containment Capacity: 2309 gallons
- Floor material: Concrete
- Drainage: Secondary containment drains back to storm sewer basin (valve normally closed)

II. Emergency Electric Generator – fuel storage tank

- Four generators with 300-500 gallon tanks
- Container contents: Fuel oil
- Floor material: Concrete pads
- Drainage: Pad drains to storm sewer
- Secondary containment – double walled tanks with level sensor between inner and outer tanks or checked monthly for leaks.

JJ. Electrical Transformers

- Eight transformers with 200-500 gallon capacity
- Container contents: Transformer oil
- Floor material: Concrete pad
- Drainage: Seven of the pads drain to storm sewers and then to storm water basin. One pad would drain to the storm sewer by-passing the basin. A spill kit is located next to the transformer.
- Annual inspection performed

KK. Outdoor Drum Storage Areas

- Various areas of plant are used for temporary drum storage on pallets
- Container contents: Oil materials
- Floor material: Concrete/asphalt pads
- Drainage: Pad drains to storm sewer basin

LL. Outdoor Loading/Unloading Racks and Transfer Piping

- Various areas of plant are used for loading and unload operations. Transfer piping runs in above ground racks throughout plant
- Floor material: Concrete/asphalt/gravel
- Drainage: Most leaks would go to storm sewer basin

SPCC Plan - Attachment 1

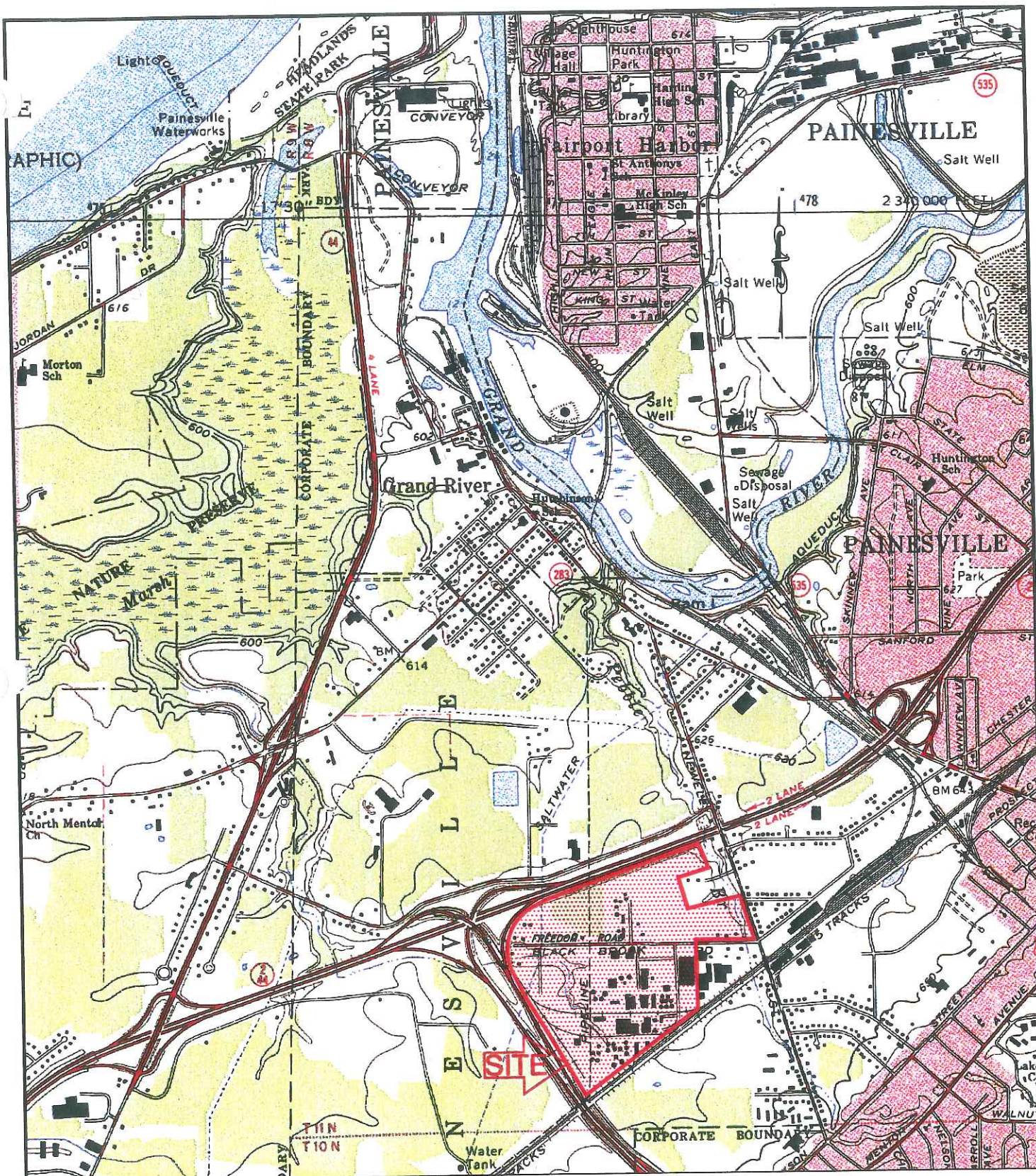


FIGURE 1-1
SITE LOCATION MAP
LUBRIZOL PAINESVILLE PLANT

SOURCE: U.S.G.S. TOPOGRAPHIC QUADRANGLE, MENTOR, OHIO.

SCALE: 1" = 2000'

S.O. NO.: 103502-1

DSN/DWN:

DATE: MAY 2004

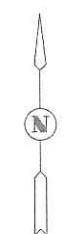
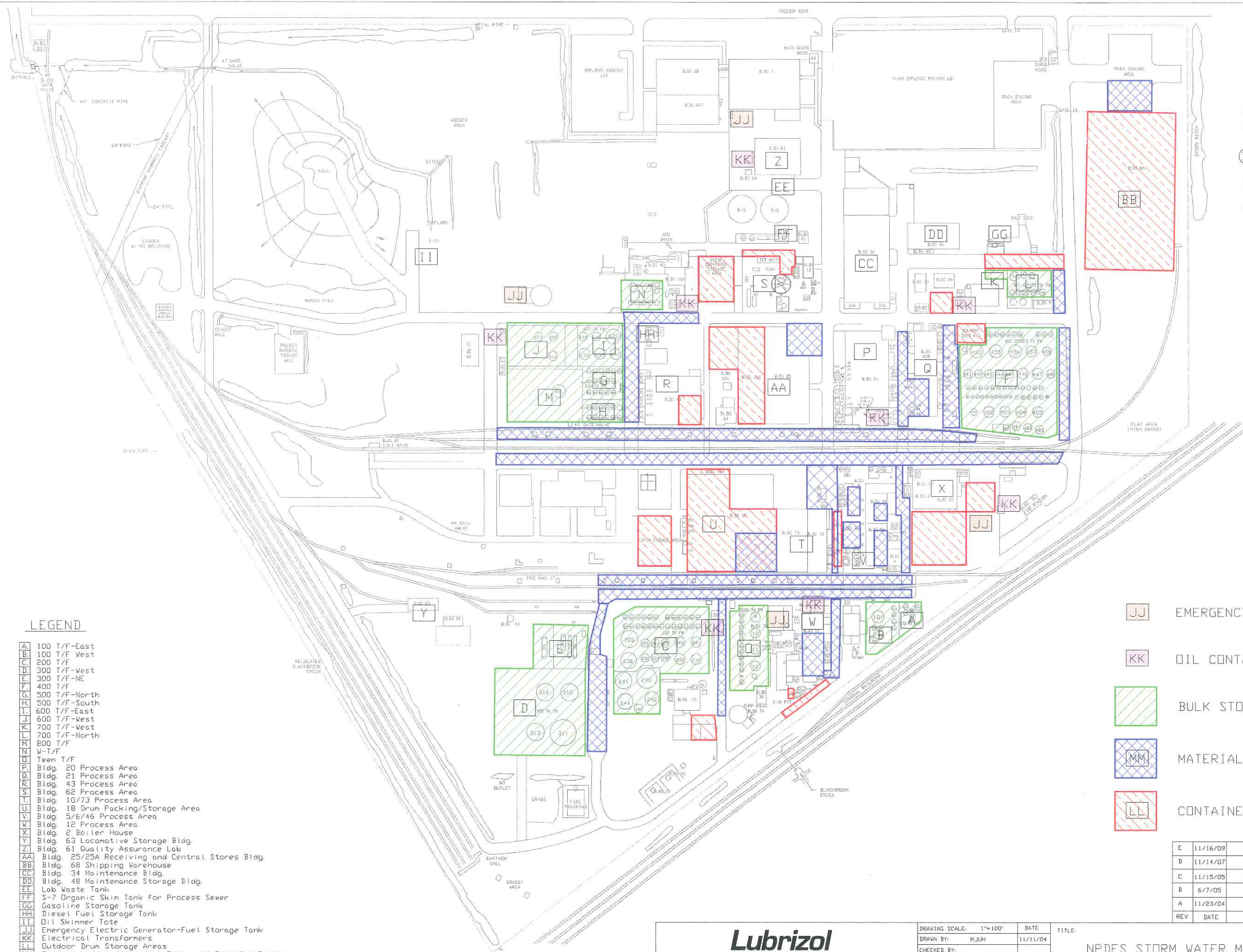
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Baker
Baker Environmental, Inc.

BAKER ENVIRONMENTAL, INC.
CORAOPOLIS, PENNSYLVANIA




LEGEND

- A. 100 T/F-East
- B. 100 T/F West
- C. 200 T/F
- D. 300 T/F-West
- E. 300 T/F-NE
- F. 400 T/F
- G. 500 T/F-North
- H. 500 T/F-South
- I. 600 T/F-East
- J. 600 T/F-West
- K. 700 T/F-West
- L. 700 T/F-North
- M. 800 T/F
- N. W-T/F
- O. Teen T/F
- P. Bldg. 20 Process Area
- Q. Bldg. 21 Process Area
- R. Bldg. 43 Process Area
- S. Bldg. 62 Process Area
- T. Bldg. 10/73 Process Area
- U. Bldg. 18 Drum Packing/Storage Area
- V. Bldg. 5/6/46 Process Area
- W. Bldg. 12 Process Area
- X. Bldg. 2 Boiler House
- Y. Bldg. 63 Locomotive Storage Bldg.
- Z. Bldg. 61 Quality Assurance Lab
- AA. Bldg. 25/25A Receiving and Central Stores Bldg.
- BB. Bldg. 68 Shipping Warehouse
- CC. Bldg. 34 Maintenance Bldg.
- DD. Bldg. 48 Maintenance Storage Bldg.
- EE. Lab Waste Tank
- FF. S-7 Organic Skin Tank for Process Sewer
- GG. Gasoline Storage Tank
- HH. Diesel Fuel Storage Tank
- II. Oil Skinner Gate
- JJ. Emergency Electric Generator-Fuel Storage Tank
- KK. Electrical Transformers
- LL. Outdoor Drum Storage Areas
- MM. Outdoor Loading/Unloading Racks and Transfer Piping

LEGEND

- JJ EMERGENCY GENERATOR FUEL OIL
- KK OIL CONTAINING ELECTRICAL XFMR
- BULK STORAGE AREAS
- MATERIAL LOADING AND UNLOADING
- CONTAINER STORAGE AREAS

E	11/16/09	UPDATED DRAWING BACKGROUND	MJUH	GEMD
D	11/14/07	UPDATED DRAWING BACKGROUND	MJUH	GEMD
C	11/15/05	ADDED SLIDE GATE VALVE #9 PER PV-858	MJUH	CAJ
B	6/7/05	ADDED SECOND LEGEND	MJUH	CAJ
A	11/23/04	ISSUED WITH PERMIT APPLICATION	MJUH	CAJ
REV.	DATE	REVISION DESCRIPTION	DRAWN	APP.



155 FREEDOM RD. PAINESVILLE PLANT PAINESVILLE, OHIO

DRAWING SCALE: 1"=100'

DRAWN BY: MJUH

CHECKED BY:

PROJECT APPROVAL:

C. E. APPROVAL:

PROJECT NUMBER:

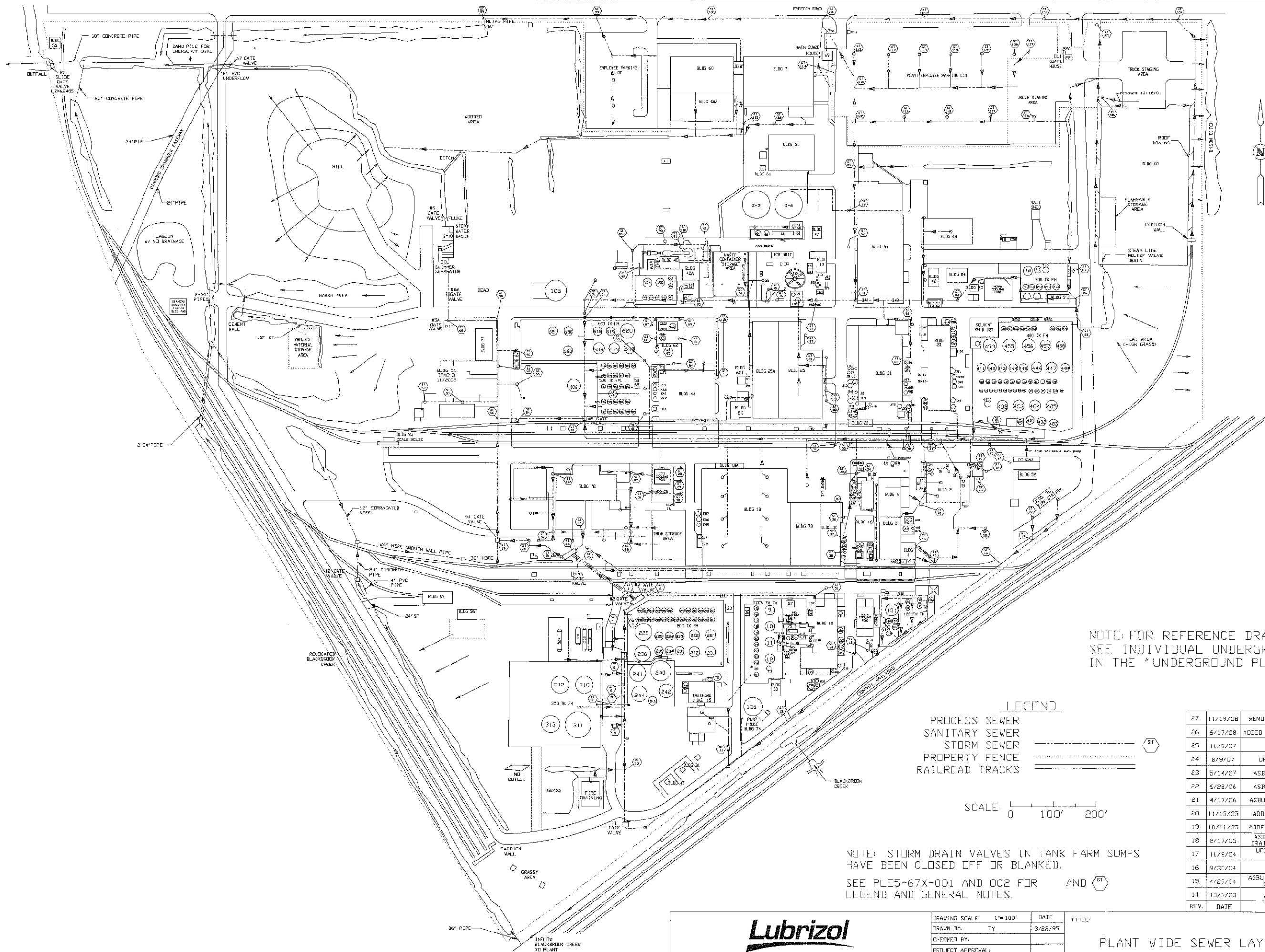
DATE: 11/11/04

TITLE: NPDES STORM WATER MAP DRAWING #3

DRAWING NO. PLD5-131-003 3 OF 4

REV. E

CADD NUMBER: PL131003



NOTE: FOR REFERENCE DRAWINGS
SEE INDIVIDUAL UNDERGROUND PLOT DRAWINGS
IN THE "UNDERGROUND PLOTS" FOLDER

LEGEND

PROCESS SEWER ————

SANITARY SEWER ————

STORM SEWER ————

PROPERTY FENCE ————

RAILROAD TRACKS ————

SCALE: 0 100' 200'

NOTE: STORM DRAIN VALVES IN TANK FARM SUMPS
HAVE BEEN CLOSED OFF OR BLANKED.
SEE PLE5-67X-001 AND 002 FOR LEGEND AND GENERAL NOTES.

27	11/19/08	REMOVED BLDG 51 & ASSOCIATED EQUIPMENT	MJUH	
26	6/17/08	ADDED 146, D-115 & D-125 & NEW FUME INCINERS	MJUH	
25	11/9/07	ADDED T/T STAGING & 178 TANK	MJUH	EGZ
24	8/9/07	UPDATED STORM SEWER NORTH OF VHR1	MJUH	EGZ
23	5/14/07	ASBUILT PER PV-1025D (MOCK#2007083)	MJUH	MISG
22	6/28/06	ASBUILT PER PV-881 (BLDG 20 PS-45A)	MJUH	MISG
21	4/17/06	ASBUILT PER PV-818 (REPLACED S-18 P17)	MJUH	EGZ
20	11/15/05	ADDED SLIDE GATE VALVE #9 PER PV-858	MJUH	MISG
19	10/11/05	ADDED NOTE FOR EMERGENCY DIKE SANDPILE	MJUH	CAJ
18	2/17/05	ASBUILT UPDATE (ADDED PROCESS SEWER DRAINS IN BLDG 68 FLAMMABLE STG AREA)	MJUH	PTS
17	11/8/04	UPDATED STORM WATER OUTFALL POINTS AND DRAINAGE BASINS	MJUH	CAJ
16	9/30/04	UPDATED PER PV-732E ADDED 24" GATE VALVE #8	MJUH	
15	4/29/04	ASBUILT UPDATE PROCESS SEWER LINE NEAR SPECIAL PRODUCTS BLDG AT PS-30	MJUH	
14	10/3/03	ADDED "ACO" DRAIN AT 700 TK FM	MJUH	
REV.	DATE	REVISION DESCRIPTION	DRAWN	APP.

Process Sewer
Oil Separator



AFL industries, inc.

3661 west blue heron blvd.
riviera beach, florida 33404
(305) 844-5200

PRIMARY TREATMENT

Enhanced Gravity Separator (EGS)

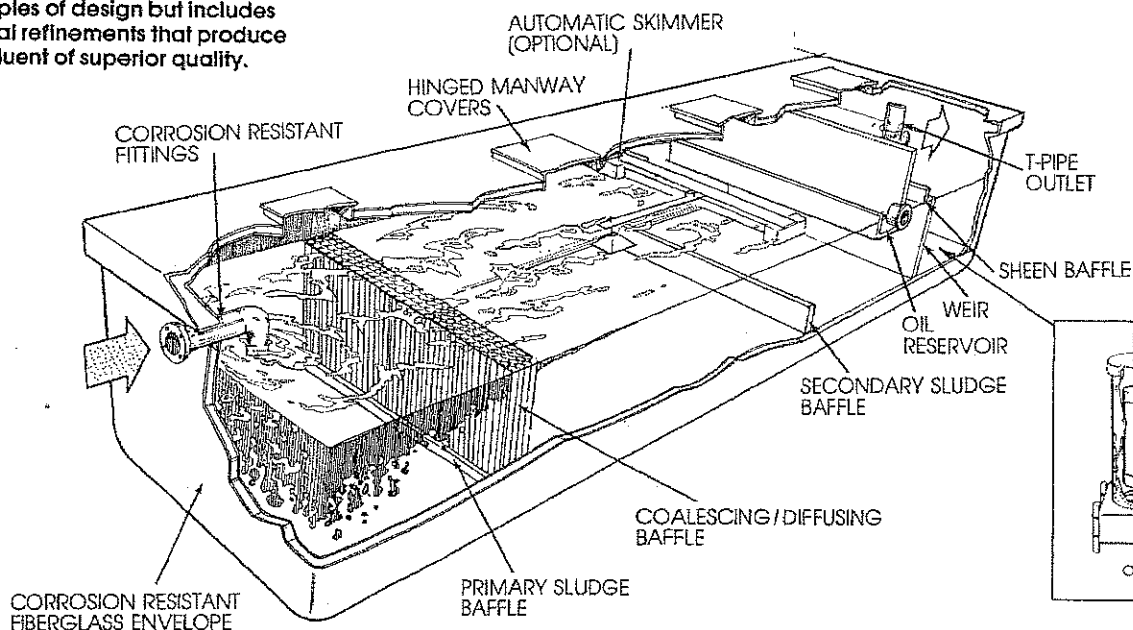
FUNCTION:

REMOVES FREE OILS (HYDRO-CARBONS) AND SETTLEABLE SOLIDS

PRODUCT BULLETIN

NO. 1-05.B.1A

AFL separator applies API basic principles of design but includes internal refinements that produce an effluent of superior quality.



FEATURES

Flow Rates, 25-700 GPM (continuous)
Superior Separating Capabilities
Corrosion-resistant Throughout
Exceeds API Design Criteria

No Moving Parts (no energy required)
Complete Range of Options
Available in Above-, Below-, and Flush-with-Grade Units

The AFL Model EGS relies upon the operation of gravity principles expressed in Stokes' Law to provide the separating function. Heavy settleable solids drop out of oily wastewater in the inlet chamber. In the separating chamber, the oil rises and lighter settleable solids fall. Surface oil drains to a reservoir for discharge to a storage facility. Water moves under a combined reservoir/oil retention baffle into the outlet chamber. At this point, a sheen baffle prevents discharge of surfacing residual oil. Effluent from the bottom of the chamber discharges through a T-pipe outlet. The system may incorporate pump-out equipment to transfer sludge, oil, and effluent when the application requires it.

Performance that may be expected of the EGS separator is:

- (1) removal of oil globules down to less than 100 micron size.
- (2) reduction of influent oil content to 10 mg/ltr.

Several features distinguish the EGS from other primary treatment separators:

First, it incorporates a diffusing baffle of oleophilic tubes. These tubes intercept oil globules and produce a laminar flow — a condition more conducive to effective separation.

Second, the seamless fiberglass tank resists corrosive effluents, atmospheres, and soils. Needs no liner or cathodic protection. The rugged FRP construction easily withstands associated soil and hydraulic loadings.

Check these other features:

Hinged manway covers permit ease of inspection for above- and flush-with-grade installations.

A complete selection of optional equipment permits virtually unlimited customizing. Choose from manway extensions, heating and pump-out package systems, level switches, skimmers, oil stop valve, surge tank and others.

THE LUBRIZOL CORPORATION
PAINESVILLE PLANT
PROCESS VESSEL SPECIFICATION SHEET

Page 1 of
Date: 02/25/87
P.O. No.:

Project No.	PP-988	Project Title	Process Wastewater Improvements
Vessel No.	S-2	LZ Asset Tag No.	Quote No. 1947-02
Ref. Dwgs.	Marked up copy 45439 by AFL Industries		
		Number Required	1
A. GENERAL DATA			
Vessel Width	8' ft. 9" in.	Vessel Length	50 ft. 6 in.
Total Capacity	14,900 Gal.	Normal Working Capacity	9150 Gal. lbs.
Net Working Capacity	9250 Gal.	Estimated Weight Empty*	
Head Design: Toris (ASME F&D)	Hemis	Elliptical	Other
Support: Skirt	Legs	Lugs	Insulation Thickness in.
Insulation Rings	No	Per LZ STD STD5-600-003	Lifting Lugs
Corrosion Allowance: (CS 1/8" min.)	in.	Min. Thickness = 1/4" + CA =	
Mat'l of Construction (By Purchaser)	Derakane 470-36		
Material of Construction*			
Head Thickness*	in.	Bottom Thickness*	in. 1/2 Minimum
Shell Thickness* (Bottom Course To Top)	in.		
Code Stamping: See Note 4 & 5	Required: Yes	No	X
B. DESIGN DATA			
Operating Pressure at top: Normal	0 PSIG	Max. Advise PSIG	Min. Advise PSIG
Operating Temperature: Normal	70 °F.	Max. 95 °F.	Min. 50 °F. Design Temp. 100 °F.
Material Stored	Unt'd Aqu.Wste S.G.1.0-1.1 Vapor Pres. 25 in. H2O @ Norm. Operat. Temp. 70 °F.		
Applicable Design Code:	ASTM 4097 or ASTM D3299 as applicable (latest edition)		
MAWP** (Pres. in Top Vapor Space) = Operating Pres.	0 PSIG	x 1.3*** =	0 PSIG
Hydraulic Pressure = SG (not less than 1)	1.1	x .432 x overall ht. 5 ft. =	2.38 PSIG
Design Pres. (Pres. at Bottom of Vessel) = MAWP	0 PSIG	+ Hyd. P. 2.38 PSIG =	2.38 PSIG
Max Allowable Working Pressure - Vacuum	0 in H2O	0 PSIG	
Design Wind Force 100/MPH (Outdoors)	None		
Agitator Loads: None	Max Design Torque in lbs		
Max Design Bending Moment	in lbs	Total Vertical Load	lbs Vertical
Other Design Data:	Tank grounding as per attached Lubrizol Standard 061600		

* Vendor To Provide

** MAWP = Maximum Allowable Working Pressure

***1.3 is a nominal factor. Engineer should select a factor more consistent with his selection of pressure relieving device.

C. APPURTENANCES: (Ref. Drawings: None)					
Stairway _____ Circular _____ Straight _____ Ladder _____					
Angle of Ladder/Stairway To Horizontal _____ °					
Walkway: Width _____ Ft. Length _____ Ft.					
Other: _____					
D. HEATING/COOLING (Ref. Drawings: None)					
Jacketed: _____ Coils: Internal _____ External _____ Surface Area _____ FT2					
Pressure: Design Min. _____ psig Max. _____ psig Temp.: Min. _____ °F. Max. _____ °F.					
Corrosion Allowance _____ Materials Of Construction _____					
Comments, Remarks, Additional Data: _____					
*Denotes Information To Be Provided By Bidder/Vendor					
R	3			Spec. By	
E	2			Checked By	
V.	1			Approved By	

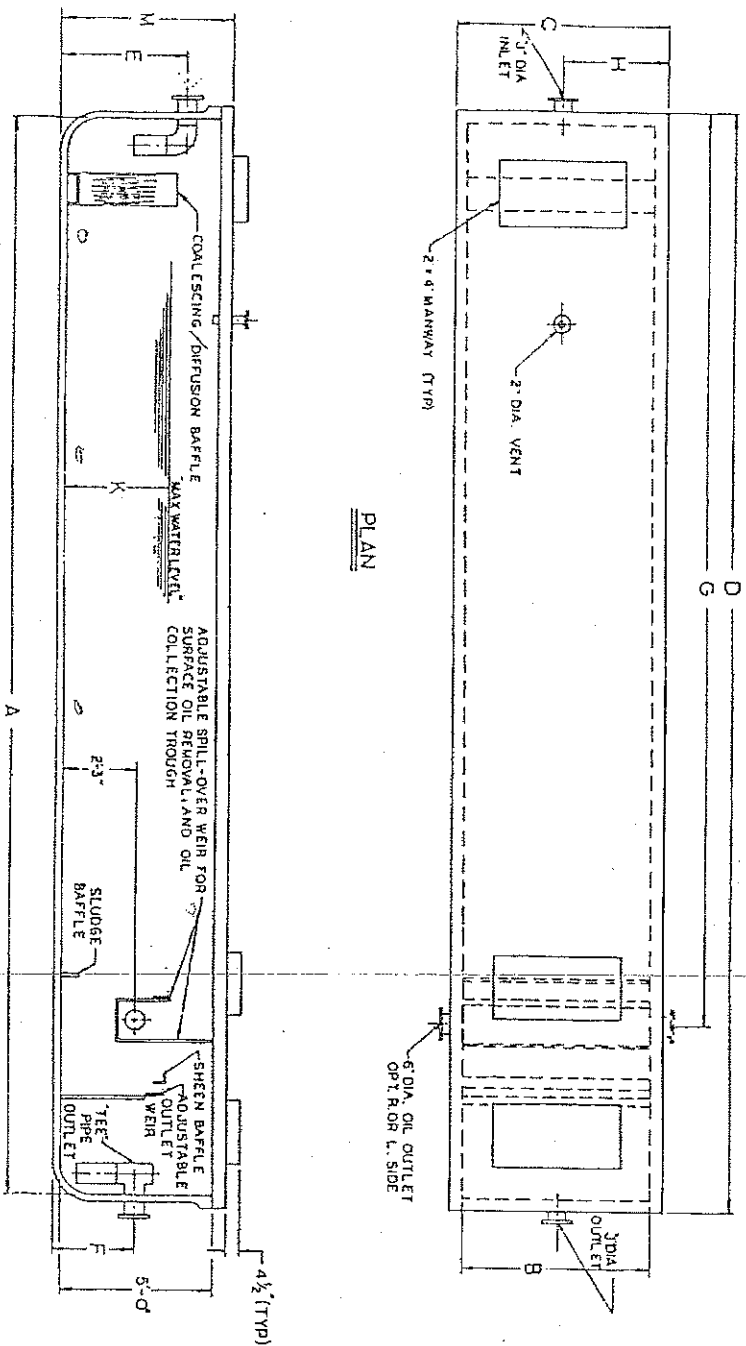
Notes: (1) Vendor will specify freight costs F.O.B. Painesville, Ohio

(2) Within two weeks of receipt of order, vendor is to furnish three (3) sets of drawings for approval and copy of calculations. After approval, supply three (3) sets of certified prints and one (1) set of reproducible certified prints, four (4) copies of Manufacturer's Data Report, evidencing construction and inspection in accordance with above code standard shall be provided.

(3) Lubrizol reserves the right to shop inspect the vessel during fabrication and witness hydrotest.

12/86

cc: Environmental Engineer



- NOTES:
1. PIPE AND FITTINGS MAY BE ONE OF THE FOLLOWING TYPES:
SCH 40 PVC - STANDARD
SCH 80 PVC
SCH 40 CPVC
SCH 80 CPVC
 2. OTHER FIBER MATERIALS AVAILABLE
ON REQUEST.
 3. ALL FIBER MATERIALS AVAILABLE
ON REQUEST.
 4. ALL FIBER MATERIALS AVAILABLE
ON REQUEST.
 5. SEPARATORS SHOULD BE ADEQUATELY SIZED
ACCORDING TO GPM, PRODUCT QUALITY, SIZE,
TEMPERATURE, SPECIFIC GRAVITY AND F-
ACTION RESULTING EFFLUENT DISCHARGE.
RANGE OF 10 GPM OF FREE OIL.
 6. ALL DIMENSIONS ARE IN FEET AND INCHES
AND ARE NOT TO BE USED FOR CONSTRUCTION,
AND ARE SUBJECT TO CHANGE.
 7. MODIFICATIONS AND SPECIAL EQUIPMENT TO
SUIT SPECIFIC CUSTOMER REQUIREMENTS
ARE AVAILABLE FROM FACTORY UPON
APPROVAL BY APL'S ENGINEERING
DEPARTMENT.
 8. ALL DIMENSIONAL TOLERANCE $\pm \frac{1}{8}$ "
 9. DIMENSIONS SHOWN ARE FOR ABOVE OR
FLUSH WITH GRADE INSTALLATION
(CONSULT FACTORY FOR BELOW GRADE
INSTALLATIONS).

DIMENSIONAL TABLE

MODEL	A	B	C	D	E	F	G	H	J	K	M	OPERATING CAPACITY (GALLONS)	EMPTY TANK (LBS)	OPERATING CAPACITY (GALLONS)	EMPTY TANK (LBS)
EGS 50	12'-9"	6'-2 1/4"	6'-1 1/2"	13'-6"	3'-9 3/8"	2'-5 3/8"	7'-9 1/4"	3'-5 3/4"	4"	3'-1 3/4"	5'-7 3/8"	1732	2401	16849	16849
EGS 100	19'-0"			19'-9"	3'-9 3/8"		14'-0 1/2"		6"	3'-1 1/4"		2510	3394	25105	25105
EGS 150	26'-0"			26'-9"	3'-10 3/8"		21'-0 1/2"		6"	3'-2"		3591	4515	34390	34390
EGS 200	33'-6"			34'-3"	3'-10 3/8"		28'-6 3/8"		6"	3'-2 1/4"		4636	5702	44347	44347
EGS 300	49'-9"			50'-6"	3'-11 3/8"		44'-9 1/2"		6"	3'-2 1/4"		6993	8290	66386	66386
EGS 400	49'-9"	8'-0"	8'-9"	50'-6"	4'-1 1/8"	2'-6 3/8"	44'-9 1/2"	4'-4 1/2"	10"	3'-2 1/4"	5'-8 3/8"	9354	9734	87454	87454
EGS 500	62'-9"	8'-0"	8'-9"	63'-6"	4'-1 1/8"	2'-8 3/8"	57'-9 1/2"	4'-4 1/2"	10"	3'-2 1/4"	5'-8 3/8"	11516	12150	108197	108197
EGS 600	60'-3"	10'-0"	10'-9"	61'-0"	4'-2"	2'-7"	55'-3 1/2"	5'-4 1/2"	10"	3'-2 1/4"	5'-8 3/8"	14279	15449	134363	134363
EGS 700	68'-0"	10'-0"	10'-9"	68'-9"	4'-3"	2'-6"	63'-0 1/2"	5'-4 1/2"	12"	3'-2 1/4"	5'-8 3/8"	16173	17354	152334	152334

SECTION THRU ELEVATION

ENGINEERING A BETTER ENVIRONMENT

APL Industries, Inc.

3661 BLUE HERON BLVD., RIVIERA BEACH, FLA. 33404

SCALE: NONE

DATE: 1-82

EGS 50-700 (MOLDED)

DIMENSIONAL LAYOUT 1 05. D.4

JOB: DRAWING NUMBER

Storm Water Basin
Oil Separator

Megator Oily Water Separators

Models

SEPARATOR MODEL	CAPACITY	BUILT IN STORAGE TANK	OIL RECOVERY UNIT
S-1-A-1.5	10 GPM	35 Gal.	L-100
S-2-A	20 GPM	—	L-125
→ S-2-A-1	20 GPM	90 Gal.	L-125
S-3-A	40 GPM	—	L-150
S-3-A-2	40 GPM	240 Gal.	L-150
S-4-A-1	60 GPM	120 Gal.	L-200

Specifications

GENERAL Designed to be used in conjunction with Megator OIL RECOVERY SYSTEMS. Separator includes interior baffle and hinged cover. Influent enters the unit through an inlet pipe. The inlet diffusion manifold is non-clogging. Effluent levels to 10 ppm free oils of 20 micron and smaller size with option for built in oil storage tank.

COALESCING MEDIA Oleophilic polypropylene tube bundles. Coalescing surface area of 46 sq. ft. per cubic foot.

OIL SKIMMER Separator includes an adjustable rotary pipe oil skimmer. Adjustment is made by simple rotation—no loosening of fasteners is required. Oil flow from the separator by gravity.

MATERIALS OF CONSTRUCTION

Tank—Constructed of 1/4" molded FRP (fiber reinforced Isophthalic) laminate with reinforcements of balsa core and 5 ply plywood as required.

Pipe and Fittings—Schedule 40 PVC

Media—Polypropylene.

Coating—Polyester Gelcoat with ultraviolet inhibitors—1.5 mils.

Handles—Fiberglass with stainless steel hardware.

COLOR

Tank—White

Fittings—Grey

GENERAL CHEMICAL RESISTANCE

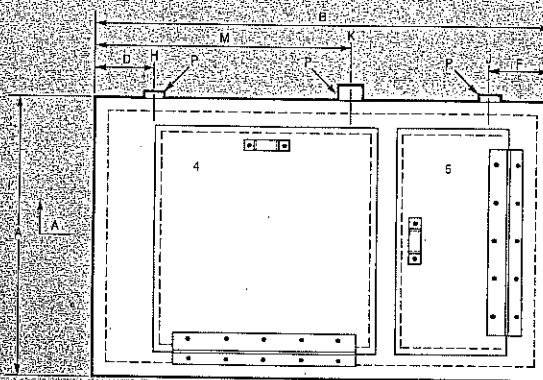
PH 5-9 as standard. Others upon request.

MAXIMUM TEMPERATURE

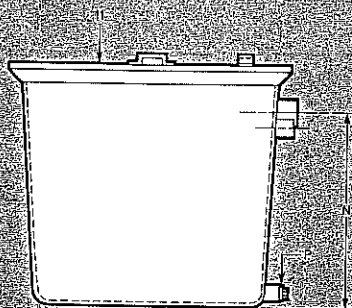
130 Degrees F. Higher temperature available upon request.

ITEM	QTY	DESCRIPTION
1	1	INLET DIFFUSER
2	1	INLET CHAMBER
3	1	SLUDGE BAFFLE
4	1	SEPARATION CHAMBER MANWAY
5	1	SEPARATION CHAMBER
6	1	REMOVABLE COALESCER PACK
7	1	ADJUSTABLE ROTARY PIPE OIL SKIMMER
8	1	OIL RETENTION BAFFLE
9	1	SHEEN BAFFLE
10	1	ADJUSTABLE EFFLUENT OVERWEIR
11	1	EFFLUENT CHAMBER MANWAY
12	1	EFFLUENT CHAMBER
13	1	EFFLUENT T-PIPE OUTLET
14	1	OIL TRANSFER PIPE
15	1	PARTITION WALL
16	1	OIL STORAGE CHAMBER

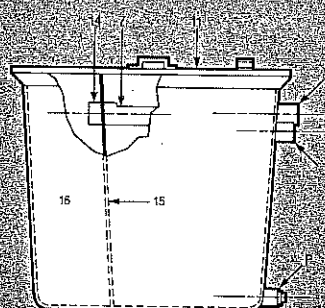
(ITEMS 14-16 FOR OIL STORAGE MODELS)



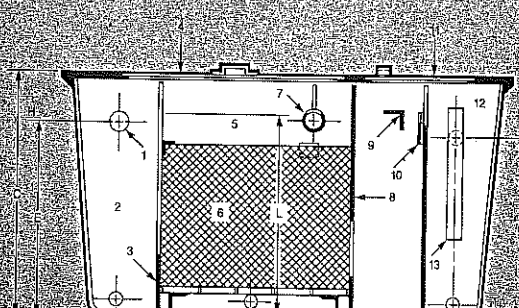
PLAN



END ELEVATION WITHOUT
OPTIONAL OIL STORAGE CHAMBER



END ELEVATION WITH
OPTIONAL OIL STORAGE CHAMBER



SECTION A-A

MODEL	A UNIT WIDTH	B UNIT LENGTH	C UNIT HEIGHT	D INFL Ø (HORIZ)	E INFL Ø (VERT)	F EFFL Ø (HORIZ)	G EFFL Ø (VERT)	H INFL DIA	J EFFL DIA	K OIL OUTLET DIA	L HIGH WATER LEVEL	M OIL OUTLET Ø (HORIZ)	N OIL OUTLET Ø (VERT)	P DRAIN (REQ) DIA	OIL STGE. VOL. (GAL)	TOTAL VOL. (GAL)	COALES- CING AREA (FT²)	SET- TLING AREA (FT²)	MAN- WAY SIZE ITEM 4	MAN- WAY SIZE ITEM 11	EMPTY WT. (LBS)	OPER. WT. (LBS)
*1-A-1.5	2'-8"	6'-0"	2'-0 1/2"	0'-8"	1'-8 1/4"	2'-1"	1'-1 3/4"	1 1/2"	1 1/2"	—	1'-6"	—	—	1 1/2"	35	125	184	5'-0"	2'x3'	2'x1'-6"	240	1333
*2-A	2'-8"	6'-0"	3'-1 1/2"	0'-9"	2'-8 3/4"	0'-9"	2'-1 1/4"	1 1/2"	2"	3"	2'-5 1/2"	3'-4 1/2"	2'-6 3/4"	1 1/2"	—	200	474	6'-11"	2'x3'	2'x1'-6"	275	1943
*2-A-1	3'-8"	6'-0"	3'-11 1/2"	0'-9"	2'-8 3/4"	0'-9"	2'-1 1/4"	1 1/2"	2"	—	2'-5 1/2"	—	—	1 1/2"	90	290	474	6'-11"	3'x3'	3'x1'-6"	515	2934
3-A	3'-8"	6'-0"	4'-1 1/2"	0'-9"	3'-8 3/4"	0'-9"	3'-2 1/4"	2"	3"	3"	3'-6 1/4"	3'-4 1/2"	3'-7"	1 1/2"	—	410	979	10'-4 1/2"	3'x3'	3'x1'-6"	495	3915
3-A-2	5'-8"	6'-0"	4'-1 1/2"	0'-9"	3'-8 3/4"	0'-9"	3'-2 1/4"	2"	3"	—	3'-6 1/4"	—	—	1 1/2"	240	650	979	10'-4 1/2"	5'x3'	5'x1'-6"	705	6126
4-A-1	5'-8"	6'-0"	4'-1 1/2"	0'-9"	3'-8 3/4"	0'-9"	3'-2 1/4"	2"	3"	—	3'-6 1/4"	—	—	1 1/2"	120	650	979	13'-10"	5'x3'	5'x1'-6"	785	6186

*NOTE: UNIT 1-A-1.5 HAS THE OIL STORAGE CHAMBER ON THE END OF THE UNIT.

Specifications

PUMPS Megator Sliding-Shoe Pumps have exceptional self-priming and suction powers, including the ability to run without harm under dry suction conditions. Positive displacement, cast iron body, with stainless steel rotor and stainless steel port plate. Standard shoe of phenolic material lined with synthetic rubber, or optional urethane shoes.

Pump sizes: L-100—1", L-125—1¼", L-150—1½", and L-200—2" suction and discharge ports. Maximum total head 100 ft., 45 psi, maximum total suction lift 23 ft. (Ask for pump brochure.)

DESIGNATION OF MODELS E—Gasoline Engine, M—Electric Motor, D—Diesel Engine

GASOLINE ENGINE Gasoline Engine with centrifugal clutch, air-cooled industrial type with hand starting equipment, built-in speed governor, positive on and off switch and screened ignition fuel tank and exhaust silencer. (5 H.P. with models L-100, L-125, L-150, 8 H.P. with model L-200.)

ELECTRIC MOTORS L-100 with 2 H.P., L-125 with 3 H.P., L-150 with 5 H.P., L-200 with 7.5 H.P., 1800 RPM, 230/460 Volts, 60 Hertz, 3 Phase, 1.15 Service Factor, Continuous Duty, T.E.F.C.

PORTABLE ASSEMBLY AND DRIVE Pump and prime mover mounted on portable tubular frame with steel plate, belt guard, and two 12" semi-pneumatic wheels. (Portable base suitable for stationary mounting.)

SKIMMER Megator Alpha Stainless Steel Skimmer with adjustable weir (in 304 S.S.) three fixed stainless steel spun wound floats (in 430 S.S.) sealed with silver solder. Also available with an option stainless steel screen in (304 S.S.). Approximate dimensions: for models L-100 through L-150 Weir—7½" diameter, hose connection 1½", weight 20 lbs., radius 20¼", minimum operating depth 10", float size 11½", float depth 4". (For model L-200—hose connection 2", weight 22 lbs.)

SUCTION/DISCHARGE HOSE AND COUPLINGS

Standard hose used with each recovery system is Plastiflex Hi-Vac Floating Hose 1½" x 30', Spiral Reinforced Non-floating Urethane Hose to insure proper floatation of skimmer 1½" x 10'. Discharge Hose 1½" x 10'. Appropriate sets of quick disconnect couplings made of polypropylene. (2" hose and couplings for model L-200)

APPROXIMATE WEIGHTS AND DIMENSIONS

Approximate weights for all models with portable bases:

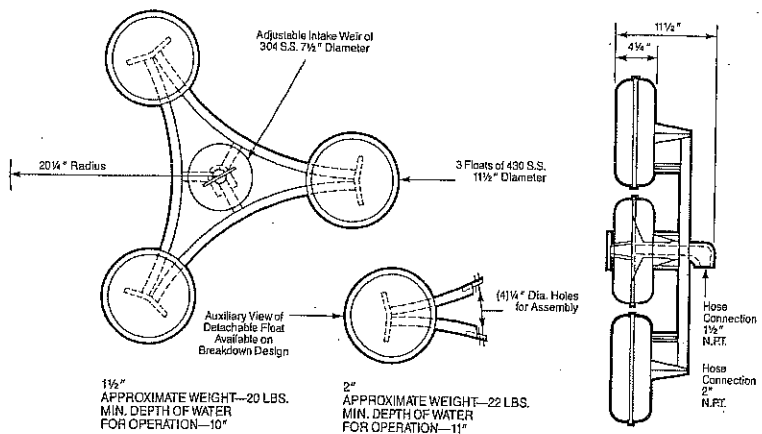
L-100—200 lbs., L-125—225 lbs., L-150—260 lbs., L-200—325 lbs.

Approximate dimensions for all portable models—51" x 22" x 23".

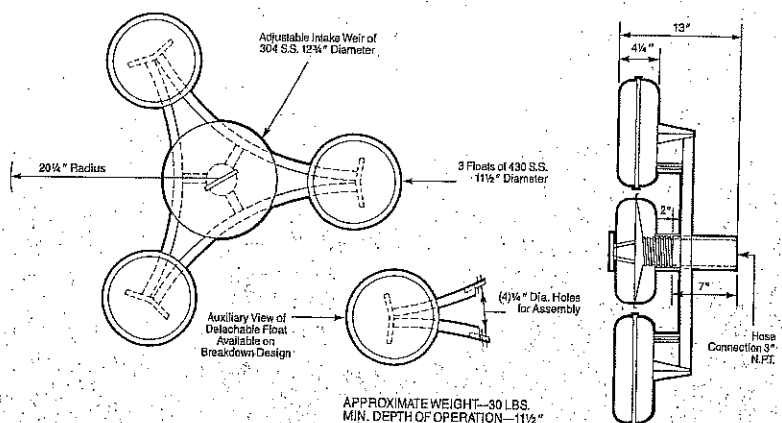
(For information of optional equipment consult with factory)

EXPLOSION-PROOF MOTORS, SINGLE PHASE MOTORS, DIESEL ENGINE AND SPECIAL HOSES (Consult factory for prices and specifications).

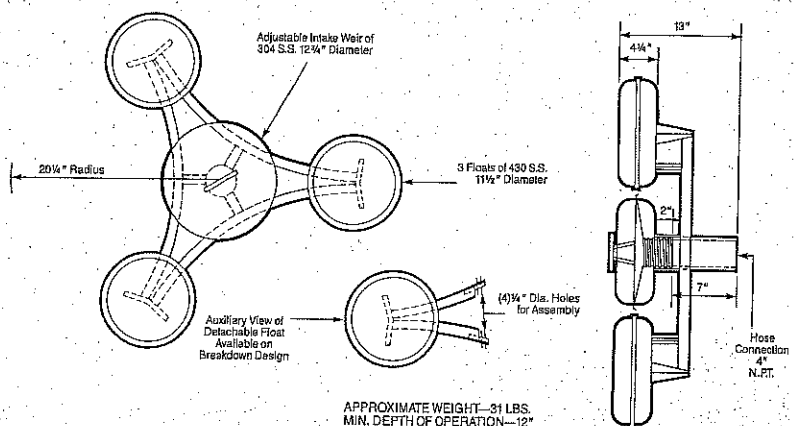
Alpha 1½" and 2" S/S Skimmer



Alpha 3" S/S Skimmer



Alpha 4" S/S Skimmer



Megator Types L & H Pumps

Standard Ratings

HIGH SUCTION RATINGS

For very high suction lifts, high viscosities and dirty liquids consult factory.

CHARACTERISTICS

The Sliding-Shoe Pump delivers its rated capacity at any head and any suction lift within its range. The head developed is the head imposed by the system at the rated flow. A head-capacity curve on the conventional basis would be a straight line.

INTERMEDIATE CAPACITIES

For intermediate capacities, pumps can be run at speeds lower than those listed in the tables. The head is independent of the speed. The capacity at a given head is approximately proportional to the speed.

MOTOR HORSEPOWERS

The standard motors listed provide for the maximum heads.

Pump	Capacity	Maximum Total Head		Motor HP		Maximum Total Suction Lift				Pump rev/min
	U.S. gal/min	feet water	lbs/in ²	WATER	4500 SSU	WATER		4500 SSU		
						feet	in Hg	feet	in Hg	

TYPE L Belt-Drive: Total Heads To 100 Feet

L75	6	100	45	1/4	1	23	20	20	18	1575
L100	12	100	45	1 1/2	2	23	20	20	18	1575
L125	20	100	45	1 1/2	3	23	20	20	18	1290
L150	40	100	45	3	5	23	20	20	18	1225
L200	60	100	45	5	7 1/2	23	20	20	18	1120
L300	120	100	45	7 1/2	15	20	17	18	16	780
L400	240	100	45	15	30	20	17	18	16	760

TYPE H Belt-Driven: Total Heads To 250 Feet

H75	6	250	110	1	2	23	20	20	18	1390
H100	12	250	110	2	3	23	20	20	18	1345
H125	20	250	110	3	5	23	20	20	18	1200
H150	40	250	110	5	7 1/2	23	20	20	18	1120
H200	60	250	110	7 1/2	10	22	19	20	18	960
H300	100	250	110	10	20	22	19	20	18	960
H400	200	250	110	20	40	22	19	20	18	960

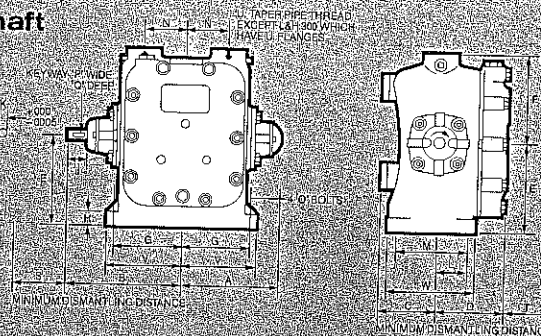
TYPE L Direct-Coupled: Total Heads To 100 Feet

L75	6.5	100	45	1/4	1	23	20	20	18	1730
L100	13	100	45	1 1/2	2	23	20	20	18	1730
L125	18	100	45	1 1/2	3	23	20	20	18	1150
L150	35	100	45	3	5	23	20	20	18	1150
L200	60	100	45	5	7 1/2	23	20	20	18	1150
L300	130	100	45	7 1/2	15	20	17	18	16	865
L400	260	100	45	15	30	20	17	18	16	865

TYPE H Direct-Coupled: Total Heads To 250 Feet

H75	7.5	250	110	1	2	23	20	20	18	1730
H100	15	250	110	2	3	23	20	20	18	1730
H125	18	250	110	3	5	23	20	20	18	1150
H150	40	250	110	5	7 1/2	23	20	20	18	1150
H200	54	250	110	7 1/2	10	21	18	20	18	865
H300	90	250	110	10	20	21	18	20	18	865
H400	180	250	110	20	40	21	18	20	18	865

Pumps with bare shaft L & H 75-L & H 300



Approximate weights

	lbs		lbs
L75	38	H75	51
L100	56	H100	71
L125	80	H125	100
L150	122	H150	168
L200	166	H200	221
L300	406	H300	452

Pump type	A	B	C	D	E	F	G	H	J	K	L	M	N	O	P	Q	R	S	T	U	V	W	X
L75	6 1/4	7 3/4	3 1/4	4	4 1/2	4 1/2	3 3/8	3/4	1 1/2	1 1/2	1 1/8	4	2 3/16	5/16	1/8	1/16	—	9 1/4	3	3/4	3 3/4	4 3/4	—
L100	7	8 1/4	4	4 5/8	5	5	4	7/8	1 1/2	1 1/2	2	5 1/4	2 1/16	3/8	1/8	1/16	—	10 1/4	3 3/4	1	4 5/8	6	—
L125	7 1/2	9	4 1/2	5 1/8	6	6 1/4	5	7/8	1 5/8	5/8	2 3/8	8 1/4	3 1/4	3/8	3/16	3/32	—	12 1/4	4	1 1/4	5 7/16	7 1/8	—
L150	8 3/8	10	4 1/2	6	7 1/4	7 1/2	5 3/4	1 1/4	1 3/4	3/4	2 5/8	6	3 1/2	1/2	3/16	3/32	—	13 3/4	5	1 1/2	6 3/8	7 1/4	—
L200	9 3/8	11 1/8	5 3/8	6 3/8	8 1/2	8 3/4	6	1 1/4	1 7/8	1	2 7/8	7	3 3/4	1/2	1/4	1/8	—	14 3/4	5 1/2	2	6 5/8	8 1/4	—
L300	13 1/2	16	7 1/16	9 3/4	11	13	8	2	4	1 1/4	4 1/4	11	4 1/8	5/8	3/16	3/64	—	20	12	3	8 15/16	12 7/8	—
H75	6 1/2	8	3 1/2	4 1/2	4 1/2	4 1/2	3 3/8	3/4	1 1/2	5/8	1 1/8	4 1/4	2 3/16	5/16	3/16	3/32	—	10	3 1/4	3/4	3 3/4	5 1/2	—
H100	7 1/2	9 1/4	4 1/2	4 7/8	5	5	4	7/8	2	3/4	2	5 1/4	2 1/16	3/8	3/16	3/32	—	11 1/2	4 1/4	1	4 3/8	6	—
H125	8 3/8	10 1/2	4 1/2	5 3/8	6	6 1/4	5	7/8	2	1	2 3/8	8 1/4	3 1/4	3/8	1/4	1/8	—	13 1/4	5	1 1/4	5 7/16	7 1/8	—
H150	9 3/8	11 1/8	4 3/4	6 3/8	7 1/4	7 1/2	5 3/4	1 1/4	2 1/8	1 1/8	3	7	3 1/2	1/2	5/16	7/64	—	14 1/2	5 1/2	1 1/2	6 3/8	8 1/4	—
H200	10 1/4	12 1/2	6 1/8	6 3/4	8 1/2	8 3/8	6	1 1/4	2 3/4	1 1/4	3 3/16	8 1/2	3 3/4	1/2	3/8	7/64	—	15 1/2	6 1/2	2	6 5/8	9 3/4	—
H300	14	17	7 1/16	9 3/4	11	13	8	2	4	1 1/2	4 1/4	11	4 1/8	5/8	3/8	5/32	—	21	12	3	8 15/16	12 7/8	—

SPILL RESPONSE NOTIFICATION FORM

Reporter's Name: _____
(Last) (First) (M.I.)

Position: _____

Phone Numbers: Day () _____
Evening () _____

Company: _____

Organization Type: _____

Address: _____
(Street)

(City) (State) (Zip)

Were materials discharged? Yes _____ No _____

Confidential? Yes _____ No _____

Meeting federal obligations to report? Yes _____ No _____ Date called: _____

Calling for responsible party? Yes _____ No _____ Time called: _____

Incident Description:

Source and/or cause of incident: _____

Date of incident: _____

Time of incident: _____ (AM/PM)

Incident address/location: _____

Nearest City: _____ State: _____

Distance from city: _____ Units of measure: _____ Direction from city: _____

Section: _____ Township: _____

Range: _____ Borough: _____

Container type: _____ Tank oil storage capacity: _____

Units of measure: _____

Facility Oil Storage Capacity: _____ Units of Measure: _____

Facility Latitude: _____ Degrees _____ Minutes _____ Seconds

Facility Longitude: _____ Degrees _____ Minutes _____ Seconds

Material:

CHRIS Code	Discharged Quantity	Unit of Measure	Material Discharged in Water	Quantity	Unit of Measure

Response Action:

Actions taken to correct, control or mitigate incident: _____

Were there evacuations? Yes____No____ Number evacuated: _____

Was there any damage? Yes____No____ Approx. damage in dollars: \$ _____

Medium affected: _____

Description: _____

More information about medium: _____

Additional Information:

Any information about the incident not recorded elsewhere in the report: _____

Caller Notifications:

EPA? Yes____No____ USCG? Yes____No____ State? Yes____No____

Other? Yes____No____ Describe: _____

Impact:

Number of injuries: _____ Number of deaths: _____

CERTIFICATION OF THE APPLICABILITY OF THE SUBSTANTIAL HARM

Facility Name: The Lubrizol Corporation
Facility Address: 155 Freedom Rd.
Painesville, OH 44077

1. Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000 gallons?

Yes _____ No ✓

2. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground oil storage tank area?

Yes _____ No ✓

3. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Appendix C-III of 40 CFR 112.20 or a comparable formula) such that the discharge from the facility could cause injury to fish and wildlife sensitive environments?

Yes ✓ No _____

4. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Appendix C-III of 40 CFR 112.20 or a comparable formula) such that the discharge from the facility would shut down a public drinking water intake?

Yes _____ No ✓

5. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons within the last 5 years?

Yes _____ No ✓

Certification:

I certify under penalty of law that I have personally examined and am familiar with the information submitted above, and that based on my inquiry of those individuals responsible for obtaining information, I believe that the submitted information is true, accurate, and complete."

Name (Type or Print)	Title
CRAIG A. HUPP	GENERAL MANAGER
Signature	Date
<u>Craig A. Hupp</u>	23-DECEMBER, 2009

RESPONSE PLAN COVER SHEET

IMPORTANT

This form is intended to be computer readable. To complete this form, all entries should be typed in black or blue ink. Please do not fold, staple, or mutilate this form. Return this form in a 9" x 12" envelope. Please print requested information in BOXES for each individual question.

CORRECT MARK

INCORRECT MARKS

☐ ☐ ☒ ☐ ☐

EXAMPLE:

NAME	P	A	:	:	A	U	D	I	Y	O	H	-	L	J	X	Z	O	A	C	R	S	H	U	Y	X	X	N
	P	A	:	:	A	U	D	I	Y	O	H	-	L	J	X	Z	O	A	C	R	S	H	U	Y	X	X	N
	E	A	:	:	A	U	D	I	Y	O	H	-	L	J	X	Z	O	A	C	R	S	H	U	Y	X	X	N

[illegible][illegible]

INSTRUCTIONS

This form is designed to accompany a submitted Response Plan.

Explanations and detailed instructions can be found in Appendix G.

Facility Information contained here will be returned with the Response Plan.

LARGEST TANK CAPACITY (GALLONS)		MAXIMUM STORAGE CAPACITY (GALLONS)	
1	0	0	0
2	0	0	0
3	0	0	0
4	0	0	0
5	0	0	0
6	0	0	0
7	0	0	0
8	0	0	0
9	0	0	0
10	0	0	0
11	0	0	0
12	0	0	0
13	0	0	0
14	0	0	0
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99	0	0	0
100	0	0	0

NUMBER OF TANKS	0	1	2	3	4	5	6	7	8	9
	0	1	2	3	4	5	6	7	8	9

GENERAL INFORMATION:

public reporting burden for the collection of this information is estimated to vary from one hour to 270 hours per response in the first year, with an average of 15 hours per response. The estimate includes time for reviewing instructions, searching existing data sources, gathering the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any aspect of this collection of information, including suggestions for reducing the burden to: CHRL, Information Policy Branch, PM-223, U.S. Environmental Protection Agency, 401 M Street, SW, Washington, D.C. 20460; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, D.C. 20503.

FACILITY INFORMATION

(CONTINUED)

REMEMBER

USE BLACK OR BLUE INK
DO NOT FOLD, STAPLE, OR MUTILATE THIS FORM

FACILITY ADDRESS		Street address, route or box	
1	2	3	4
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DETERMINATION OF SUBSTANTIAL HARM

Does the facility operation include over-water transfers* of oil to or from vessels and does the facility have a maximum capacity greater than or equal to 42,000 gallons?

☒ YES ☐ NO

Does the facility have adequate secondary containment* for each aboveground storage area sufficiently large to contain the capacity of the largest aboveground storage tank within that storage area and is the total storage capacity greater than or equal to one million gallons?

☒ YES ☐ NO

Is the facility located at a distance* that would shut down a public drinking water intake and is the total storage capacity greater than or equal to one million gallons?

☒ YES ☐ NO

Is the facility located at a distance* that could cause injury to an environmentally sensitive area as referenced in Appendix D and is the total storage capacity greater than or equal to one million gallons?

☒ YES ☐ NO

Within the past five years, has the facility experienced a reportable spill* exceeding 10,000 gallons and is the total storage capacity greater than or equal to one million gallons?

☒ YES ☐ NO

* Explanations of the above referenced terms can be found in Appendix C. If an alternative formula to the ones contained in Attachment C-III is used to establish the appropriate distance to sensitive environments or drinking water intakes, documentation of the reliability and analytical soundness of the formula must be attached to this form.

ADDITIONAL INFORMATION

LATITUDE (DEGREES NORTH)		
degrees	min.	sec.
4	4	1
0	0	0
1	1	1
2	2	2
3	3	3
4	4	4
5	5	5
6	6	6
7	7	7
8	8	8
9	9	9

LONGITUDE (DEGREES WEST)		
degrees	min.	sec.
8	1	2
0	0	0
1	1	1
2	2	2
3	3	3
4	4	4
5	5	5
6	6	6
7	7	7
8	8	8
9	9	9

FACILITY DISTANCE TO NAVIGABLE WATER:
Fill the appropriate circle.

- ☒ 0 - 1/4 mile
☐ 1/4 - 1/2 mile
☐ 1/2 - 1 mile
☐ > 1 mile

REMEMBER

USE BLUE OR BLACK INK
DO NOT FOLD, STAPLE, OR MUTILATE THIS FORM

CERTIFICATION

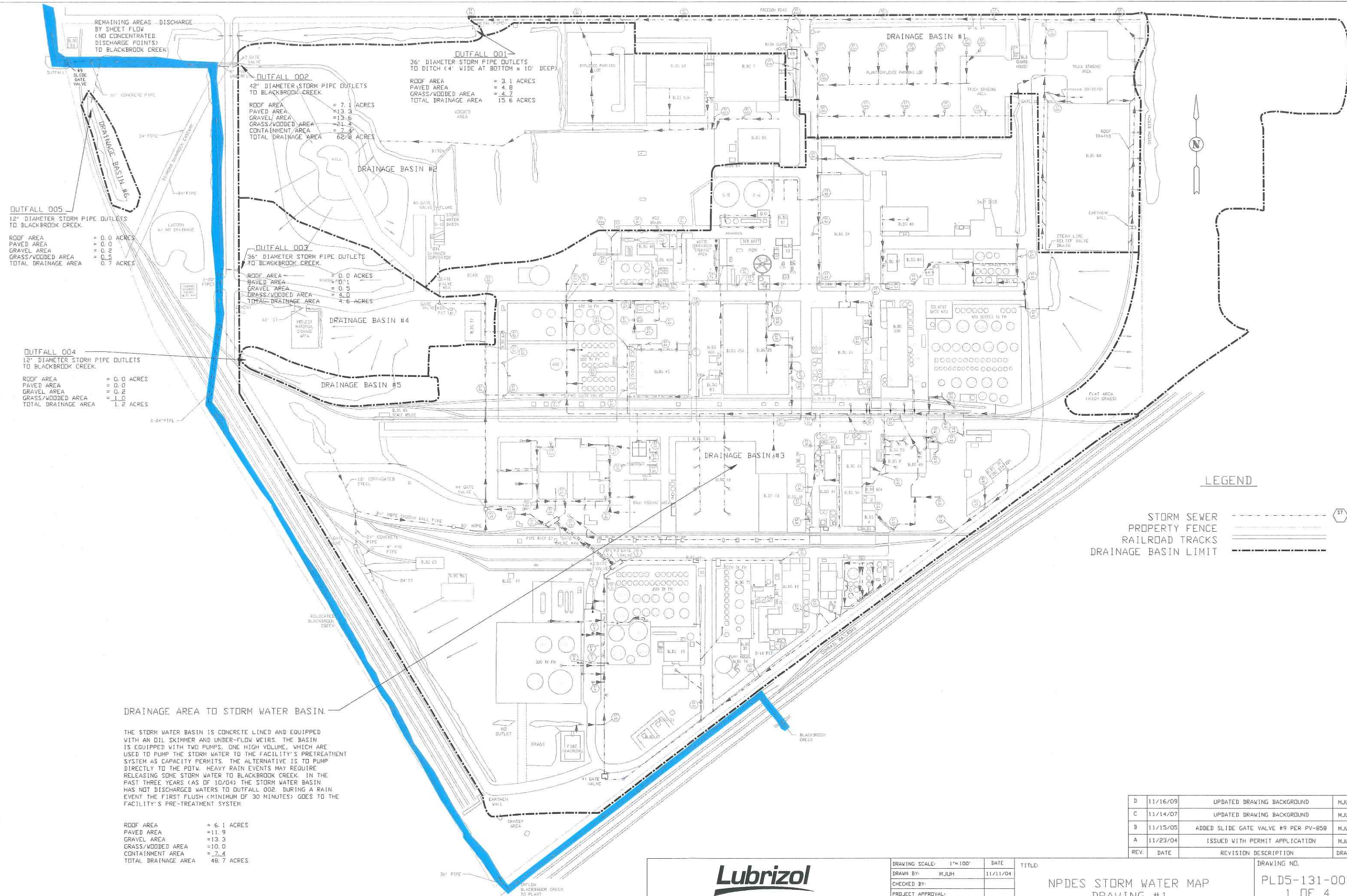
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining information, I believe that the submitted information is true, accurate, and complete.

John L. Petric
Signature

John L. Petric
Name (please type or print)

General Manager
Title

2-18-93
Date



DRAINAGE AREA TO STORM WATER BASIN.

THE STORM WATER BASIN IS CONCRETE LINED AND EQUIPPED WITH AN OIL SKIMMER AND UNDER-FLOW WEIRS. THE BASIN IS EQUIPPED WITH TWO PUMPS, ONE HIGH VOLUME, WHICH ARE USED TO PUMP THE STORM WATER TO THE FACILITY'S PRETREATMENT SYSTEM AS CAPACITY PERMITS. THE ALTERNATIVE IS TO PUMP DIRECTLY TO THE POTW. HEAVY RAIN EVENTS MAY REQUIRE RELEASING SOME STORM WATER TO BLACKBROOK CREEK. IN THE PAST THREE YEARS (AS OF 10/04) THE STORM WATER BASIN HAS NOT DISCHARGED WATERS TO OUTFALL 002. DURING A RAIN EVENT THE FIRST FLUSH (MINIMUM OF 30 MINUTES) GOES TO THE FACILITY'S PRE-TREATMENT SYSTEM.

ROOF AREA = 6.1 ACRES
PAVED AREA = 11.9
GRAVEL AREA = 13.3
GRASS/WOODED AREA = 10.0
CONTAINMENT AREA = 7.4
TOTAL DRAINAGE AREA 48.7 ACRES

LEGEND

STORM SEWER
PROPERTY FENCE
RAILROAD TRACKS
DRAINAGE BASIN LIMIT

155 FREEDOM RD
PAINESVILLE PLANT
PAINESVILLE, OHIO

DRAWING SCALE: 1"=100'
DATE: 11/11/04
DRAWN BY: MJUH
CHECKED BY:
PROJECT APPROVAL:
C. E. APPROVAL:
PROJECT NUMBER:

TITLE:
NPDES STORM WATER MAP
DRAWING #1

D	11/16/09	UPDATED DRAWING BACKGROUND	MJUH	GEMD
C	11/14/07	UPDATED DRAWING BACKGROUND	MJUH	GEMD
B	11/15/05	ADDED SLIDE GATE VALVE #9 PER PV-858	MJUH	CAJ
A	11/23/04	ISSUED WITH PERMIT APPLICATION	MJUH	CAJ
REV.	DATE	REVISION DESCRIPTION	DRAWN	APP.

DRAWING NO.
PLD5-131-003
1 OF 4

CADD NUMBER: PL131003

TOPIC: Spill Prevention Control and Countermeasure Plan

REVISION LOG

Date Approved	Revision
12/16/05 CAJ	112.7(g)(4) and 112.8(d)(2): Added 6 months as definition of extended time for loading/unloading connections to be out of service before they will be capped or blind-flanged.
8/10/07 CAJ	Updated contact information, pg I-7 Provided missing document number for procedure in 112.7(a)(3)(ii) on pg. II-3
12/07/09 GEMD	Revised contact information, pgs I-3 & I-7; updated secondary containment information (105b tank and S-10 Oil Skimmer Tote). Revised pgs. II-1, 6, 11; pgs. IV-3, 4, 5, 8 & IV-9; Attachments 2, 3, 4, 8, 9 (Revision Log), and 11.

Gemd 12/07/09

Electrical Transformers

SMT#1

Nameplate

Data

Mfg	GE	Equip Type	Transformer
Date Mfg		Trans Class	OA/FA
S/N	M163470	Impedence	5.57%
kVA	2000	Phase/Cycle	3/60
Pri	4,160 D	Liquid Type	oil
Sec	480 Y	Gal Liq.	334
Weight	9485	Other Access	

SMT#2

Nameplate

Data

Mfg	GE	Equip Type	Transformer
Date Mfg		Trans Class	OA
S/N	G852885	Impedence	5.65%
kVA	3000	Phase/Cycle	3/60
Pri	4,160 D	Liquid Type	oil
Sec	480 Y	Gal Liq.	500
Weight	13250	Other Access	

SMT#3

Nameplate

Data

Mfg	GE	Equip Type	Transformer
Date Mfg		Trans Class	OA
S/N	F964446	Impedence	5.82%
kVA	1500	Phase/Cycle	3/60
Pri	4,160 D	Liquid Type	oil
Sec	480 d	Gal Liq.	205
Weight	7800	Other Access	

SMT#4

Nameplate

Data

Mfg	GE	Equip Type	Transformer
Date Mfg		Trans Class	OA
S/N	C-00073-31	Impedence	6.00%
kVA	1000	Phase/Cycle	3/60
Pri	4,160 D	Liquid Type	oil
Sec	480 D	Gal Liq.	493
Weight	12000	Other Access	

SMT#5

Nameplate Data

Mfg	GE	Equip Type	Transformer
Date Mfg		Trans Class	OA
S/N	F958518	Impedence	5.63%
kVA	2000	Phase/Cycle	3/60
Pri	4,160 D	Liquid Type	oil
Sec	480 Y	Gal Liq.	225
Weight	9000	Other Access	

SMT#6

Nameplate Data

Mfg	GE	Equip Type	Transformer
Date Mfg		Trans Class	OA
S/N	H-882185	Impedence	6.06%
kVA	3000	Phase/Cycle	3/60
Pri	4,160 D	Liquid Type	oil
Sec	480 Y	Gal Liq.	500
Weight	13250	Other Access	

SMT#7

Nameplate Data

Mfg	GE	Equip Type	Transformer
Date Mfg		Trans Class	OA
S/N	H-884908	Impedence	5.89%
kVA	2000	Phase/Cycle	3/60
Pri	4,160 D	Liquid Type	oil
Sec	480 Y	Gal Liq.	217
Weight	8570	Other Access	

SMT#8

Nameplate Data

Mfg	GE	Equip Type	Transformer
Date Mfg		Trans Class	OA/FA
S/N	M163470	Impedence	5.57%
kVA	2000	Phase/Cycle	3/60
Pri	4,160 D	Liquid Type	oil
Sec	480 Y	Gal Liq.	334
Weight	9485	Other Access	

Emergency Generators
Fuel Storage Tanks

- Emergency Generator 105 fire water tank
105B tank – 500 gallons (double walled tank)
- Emergency Generator Bldg. 7
300 gallons (double walled tank)
- Emergency Generator Bldg. 12 Fume Incinerator
330 gallons (double walled tank)
- Emergency Generator Bldg. 2 Boiler House
300 gallons (double walled tank)

Tank	Capacity (GAL)	Purpose	Description	Material	Material Function	Shrink/Expansion?	AST Field	SPCC Test	Installation Year	Last Inspection	Next Inspection	Year Month	Generic Chemical Name	HAZ	Secondary Containment	Height (ft)
008'	26491	Storage Tank	8	SFL	lockup function	N	Y	SPCC test	2018/05	2018/05	2018/05	2018/05	Sulfur (LIQUID ONLY)	N/A	Gravel Dike	2
009'	88160	Storage Tank	9	166.0N	lockup function	N	Y	SPCC test	10/18/1986	3/23/04	2004	2004	Isobutylene sulfonated	N/A	Gravel Dike	2
010'	88128	Storage Tank	10	166.0N	lockup function	N	Y	SPCC test	10/18/1986	3/23/04	2004	2004	Light aromatic naphtha	N/A	Gravel Dike	2
011'	88160	Storage Tank	11	SFL	lockup function	N	Y	SPCC test	10/18/1986	3/23/04	2004	2004	Mixture	N/A	Gravel Dike	2
012'	173808	Storage Tank	12	188.0N	lockup function	N	Y	SPCC test	12/1/1984	7/25/06	2004	2004	Polyisobutyl succinic anhydride	N/A	Gravel Dike	2
013'	21127	Storage Tank	13	SO-561	lockup function	N	Y	SPCC test	10/18/1986	3/23/04	2004	2004	Petroleum naphtha	N/A	Gravel Dike	2
015'	24900	Storage Tank	15	116.4N	lockup function	N	Y	SPCC test	4/1/1987	4/1/03	2004	2004	Polyolefin anhydride	N/A	Gravel Dike	2
016'	24900	Storage Tank	16	400.43N	lockup function	N	Y	SPCC test	3/13/1987	8/14/08	2004	2004	Mixture	N/A	Gravel Dike	2
017'	24900	Storage Tank	17	0710.0N	lockup function	N	Y	SPCC test	3/23/1987	2/16/04	2004	2004	Monomers of phosphoric acid C12-14 alkylamine sulfide	N/A	Gravel Dike	2
018'	24900	Storage Tank	18	PHL-H	lockup function	N	Y	SPCC test	3/23/1987	2/16/04	2004	2004	Isobutylene sulfonated	N/A	Gravel Dike	2
019'	24900	Storage Tank	19	0829.4N	lockup function	N	Y	SPCC test	3/23/1987	9/17/03	2004	2004	Polyolefin anhydride	N/A	Gravel Dike	2
020'	24900	Storage Tank	20	PHL-LCA	lockup function	N	Y	SPCC test	3/23/1987	9/17/03	2004	2004	Alkyl (C24-28) phenol	N/A	Gravel Dike	2
021'	24900	Storage Tank	21	9960K1	lockup function	N	Y	SPCC test	3/23/1987	3/27/07	2004	2004	Mixture	N/A	Gravel Dike	2
022'	24900	Storage Tank	22	0728.6N	lockup function	N	Y	SPCC test	11/1/1981	12/4/09	2004	2004	Polyisobutyl succinic anhydride	N/A	Gravel Dike	2
023'	24900	Storage Tank	23	116.0N	lockup function	N	Y	SPCC test	11/1/1981	10/7/06	2004	2004	Polyisobutyl succinic anhydride	N/A	Gravel Dike	2
024'	19650	Storage Tank	24	EHMA	lockup function	N	Y	SPCC test	9/6/1980	10/7/06	2004	2004	2-Ethylhexyl nitrate	N/A	Gravel Dike	2
025'	26600	Storage Tank	25	BACR	lockup function	N	Y	SPCC test	3/4/2003	3/4/2003	2004	2004	Butyl acrylate	N/A	Gravel Dike	2
031'	4188	Storage Tank	31	R.O.I	lockup function	N	Y	SPCC test	5/16/1988	5/16/1988	2004	2004	Mixture	N/A	Double walled tank	2
100'	86128	Storage Tank	101	DTBP-99	lockup function	N	Y	SPCC test	4/1/1981	10/27/88	2004	2004	Diet-butyl-p-cresol	N/A	Cement Dike	4
101'	4188	Storage Tank	102	R.O.I	lockup function	N	Y	SPCC test	6/6/1988	11/7/08	2004	2004	Mixture	N/A	Steel Dike	4
104'	8688	Storage Tank	104	PAO-81	lockup function	N	Y	SPCC test	1/30/1982	11/7/08	2004	2004	Aliphatic hydrocarbon (polyphospholene)	N/A	Cement Dike	3
105'	500000	Storage Tank	105	WATER	lockup function	N	Y	SPCC test	10/18/1982	11/7/09	2005	2005	Water	N/A	Double walled tank	2
105B'	500	Storage Tank	105B	Fire water tank diesel	lockup function	N	Y	SPCC test	11/17/2009	11/7/09	2009	2009	Diesel fuel	N/A	Double walled tank	2
106'	402000	Storage Tank	106	WATER	lockup function	N	Y	SPCC test	10/18/1982	11/7/09	2005	2005	Water	N/A	Double walled tank	2
107'	402000	Storage Tank	107	WATER	lockup function	N	Y	SPCC test	10/18/1982	11/7/09	2005	2005	Water	N/A	Double walled tank	2
108'	12436	Storage Tank	118	S-19	lockup function	N	Y	SPCC test	7/1/1985	7/1/07	2003	2003	Toluene	N/A	Cement Dike	4
121'	12460	Storage Tank	122	PHD-01	lockup function	N	Y	SPCC test	7/1/1985	7/1/07	2003	2003	Toluene	N/A	Cement Dike	4
123'	12470	Storage Tank	123	to be inspected	lockup function	N	Y	SPCC test	7/1/1985	7/1/07	2003	2003	Toluene	N/A	Cement Dike	4
125'	1602	Storage Tank	125	4002.81	lockup function	N	Y	SPCC test	7/1/1981	10/1/05	2003	2003	Water	N/A	Cement Dike	4
127'	14810	Storage Tank	127	177.42	lockup function	N	Y	SPCC test	7/1/1986	13/0/06	2003	2003	C24-28 Alkylated phenol reaction product with formaldehyde	N/A	Cement Dike	4
130'	6000	Storage Tank	130	R.O.I	lockup function	N	Y	SPCC test	5/23/1983	19/0/07	2003	2003	Mixture	N/A	Cement Dike	4
132'	2200	Storage Tank	132	PHD-01	lockup function	N	Y	SPCC test	7/1/1981	7/1/07	2003	2003	Water	N/A	Cement Dike	4
134'	10775	Storage Tank	134	GISORON	lockup function	N	Y	SPCC test	3/21/1986	3/21/1986	2004	2004	Aliphatic carboxylic acid	N/A	Cement Dike	4
139'	10074	Storage Tank	139	146.191	lockup function	N	Y	SPCC test	5/17/1983	5/17/1983	2004	2004	Polyisobutyl succinic acid	N/A	Cement Dike	4
142'	13320	Storage Tank	142	170.941	lockup function	N	Y	SPCC test	8/13/1984	8/13/1984	2004	2004	(2-Ethylhexyl) acrylate copolymer	N/A	Cement Dike	4
146'	28181	Storage Tank	146	0742.61	lockup function	N	Y	SPCC test	10/2/2007	10/2/2007	2008	2008	Alkyl borate	N/A	Cement Dike	4
147'	10639	Storage Tank	147	TN8H	lockup function	N	Y	SPCC test	1/1/1988	1/1/1988	2004	2004	2-Nonyl mercaptan	N/A	Cement Dike	4
149'	10075	Storage Tank	149	DMPA	lockup function	N	Y	SPCC test	9/30/1984	1/19/06	2004	2004	1,2-Benzenediacetic acid diisobutyl ester	N/A	Cement Dike	4
150'	24453	Storage Tank	150	0708.71	lockup function	N	Y	SPCC test	8/2/1985	8/2/1985	2004	2004	Isobutylene sulfonated	N/A	Cement Dike	4
152'	10000	Storage Tank	152	170.931	lockup function	N	Y	SPCC test	7/1/1984	9/16/09	2004	2004	Isobutylene sulfonated	N/A	Cement Dike	4
153'	12206	Storage Tank	153	NAHS-R1	lockup function	N	Y	SPCC test	1/8/1988	9/1/07	2004	2004	(2-Ethylhexyl) acrylate copolymer	N/A	Cement Dike	4
154'	24864	Storage Tank	154	CS-281	lockup function	N	Y	SPCC test	7/1/1986	6/14/06	2004	2004	Sodium hydroxide (possible H2S)	N/A	Cement Dike	4
155'	10000	Storage Tank	155	HO-351	lockup function	N	Y	SPCC test	5/23/2003	5/23/2003	2004	2004	Calcium sulfonate	N/A	Cement Dike	4
158'	12295	Storage Tank	158	BOGEMD	lockup function	N	Y	SPCC test	6/1/1988	1/14/06	2003	2003	35% Hydrogen Peroxide	N/A	Cement Dike	4
159'	9090	Storage Tank	159	CVAT	lockup function	N	Y	SPCC test	6/1/1988	8/4/05	2003	2003	Vinyl acetate monomer	N/A	Cement Dike	4
160'	8090	Storage Tank	160	CVAT	lockup function	N	Y	SPCC test	6/1/1988	8/4/05	2003	2003	2-Ethylhexyl acrylate	N/A	Cement Dike	4
163'	4067	Storage Tank	163	CSL1	lockup function	N	Y	SPCC test	11/28/1986	10/21/06	2004	2004	Sodium hydroxide 50%	N/A	Cement Dike	4
164'	1480	Storage Tank	164	CSL1	lockup function	N	Y	SPCC test	11/28/1986	10/21/06	2004	2004	Sodium hydroxide 50%	N/A	Cement Dike	4
168'	12275	Storage Tank	168	9570CM	lockup function	N	Y	SPCC test	4/11/1988	1/1/06	2008	2008	Mixture	N/A	Cement Dike	4
169'	24864	Storage Tank	169	0742.01	lockup function	N	Y	SPCC test	7/1/1984	4/19/07	2004	2004	Polyisobutylene borated	N/A	Cement Dike	4
172'	25549	Storage Tank	172	Wastewater	lockup function	N	Y	SPCC test	2/20/2000	2/20/2000	2009	2009	Mixture	N/A	Cement Dike	4
175'	7970	Storage Tank	175	CDL1	lockup function	N	Y	SPCC test	11/1/1982	3/31/09	2009	2009	Carbon disulfide	N/A	Cement Dike	3.0
201'	24551	Storage Tank	201	OTL-71	lockup function	N	Y	SPCC test	11/8/2007	6/5/06	2004	2004	Octyl alcohol	N/A	Gravel Dike	3
202'	24545	Storage Tank	202	DDSA1	lockup function	N	Y	SPCC test	2/1/1983	8/5/06	2004	2004	Dodecyl succinic anhydride	N/A	Gravel Dike	3
203'	24391	Storage Tank	203	177.401	lockup function	N	Y	SPCC test	8/21/1985	4/27/09	2004	2004	Alkyl (C24-28) phenol	N/A	Gravel Dike	3
204'	24913	Storage Tank	204	DEOL1	lockup function	N	Y	SPCC test	10/10/1988	4/1/06	2004	2004	Deol alcohol	N/A	Gravel Dike	3
205'	24793	Storage Tank	205	SU2B1	lockup function	N	Y	SPCC test	11/12/1988	4/1/06	2006	2006	Severely hydrofined light naphthenic distillate	N/A	Gravel Dike	3

12/04/2009 GEMD

\$PCC_Tanks

Capacity (GAL)	Purpose	Description	Material	Lookup Function	Green/Amplification?	AST	Field	Final SAT	SPCC Test	Last Inspection	Year	Month	Generic Chemical Name	#N/A	Secondary Containment	Height (ft)
4431	Storage Tank	441	EBRA		Y	Y	Y	SPCC Test	Y	11/18/1986	2004	4	2-ethylhexyl methacrylate		Cement Dike	2
4432	Storage Tank	442	LMACR		Y	Y	Y	No	Y	3/28/03	2004	2	Lauryl methacrylate		Cement Dike	2
4443	Storage Tank	443	LMA-12141		Y	Y	Y	SPCC Test	Y	6/1/1987	2009	11	Lauryl methacrylate		Cement Dike	2
4445	Storage Tank	445	OSL		N	N	Y	No	Y	1/24/1997	2001	11	Sodium hydroxide 50%		Cement Dike	2
4446	Storage Tank	446	SUCS31		Y	Y	Y	SPCC Test	Y	6/1/1987	2006	12	Mineral oil		Cement Dike	2
4447	Storage Tank	447	SUCS1		Y	Y	Y	SPCC Test	Y	6/1/1987	2004	11	Mineral oil		Cement Dike	2
4448	Storage Tank	448	SUCS1		Y	Y	Y	SPCC Test	Y	6/1/1988	2004	6	Methacrylate copolymer		Cement Dike	2
4449	Storage Tank	449	SUCS1		Y	Y	Y	SPCC Test	Y	4/12/1988	2004	11	Mineral oil		Cement Dike	2
4450	Storage Tank	450	SUCS1		Y	Y	Y	SPCC Test	Y	10/8/02	2004	11	Mineral oil		Cement Dike	2
4451	Storage Tank	451	SUCS1		Y	Y	Y	SPCC Test	Y	4/12/1988	2004	11	Mineral oil		Cement Dike	2
4452	Storage Tank	452	SUCS1		Y	Y	Y	SPCC Test	Y	10/8/1988	2004	11	Mineral oil		Cement Dike	2
4453	Storage Tank	453	SUCS1		Y	Y	Y	SPCC Test	Y	4/12/1988	2004	11	Mineral oil		Cement Dike	2
4454	Storage Tank	454	SUCS1		Y	Y	Y	SPCC Test	Y	10/8/1988	2004	11	Mineral oil		Cement Dike	2
4455	Storage Tank	455	SUCS1		Y	Y	Y	SPCC Test	Y	4/12/1988	2004	11	Mineral oil		Cement Dike	2
4456	Storage Tank	456	SUCS1		Y	Y	Y	SPCC Test	Y	10/8/1988	2004	11	Mineral oil		Cement Dike	2
4457	Storage Tank	457	SUCS1		Y	Y	Y	SPCC Test	Y	4/12/1988	2004	11	Mineral oil		Cement Dike	2
4458	Storage Tank	458	SUCS1		Y	Y	Y	SPCC Test	Y	10/8/1988	2004	11	Mineral oil		Cement Dike	2
4459	Storage Tank	459	SUCS1		Y	Y	Y	SPCC Test	Y	4/12/1988	2004	11	Mineral oil		Cement Dike	2
4460	Storage Tank	460	SUCS1		Y	Y	Y	SPCC Test	Y	10/8/1988	2004	11	Mineral oil		Cement Dike	2
4461	Storage Tank	461	SUCS1		Y	Y	Y	SPCC Test	Y	4/12/1988	2004	11	Mineral oil		Cement Dike	2
4462	Storage Tank	462	SUCS1		Y	Y	Y	SPCC Test	Y	10/8/1988	2004	11	Mineral oil		Cement Dike	2
4463	Storage Tank	463	SUCS1		Y	Y	Y	SPCC Test	Y	4/12/1988	2004	11	Mineral oil		Cement Dike	2
4464	Storage Tank	464	SUCS1		Y	Y	Y	SPCC Test	Y	10/8/1988	2004	11	Mineral oil		Cement Dike	2
4465	Storage Tank	465	SUCS1		Y	Y	Y	SPCC Test	Y	4/12/1988	2004	11	Mineral oil		Cement Dike	2
4466	Storage Tank	466	SUCS1		Y	Y	Y	SPCC Test	Y	10/8/1988	2004	11	Mineral oil		Cement Dike	2
4467	Storage Tank	467	SUCS1		Y	Y	Y	SPCC Test	Y	4/12/1988	2004	11	Mineral oil		Cement Dike	2
4468	Storage Tank	468	SUCS1		Y	Y	Y	SPCC Test	Y	10/8/1988	2004	11	Mineral oil		Cement Dike	2
4469	Storage Tank	469	SUCS1		Y	Y	Y	SPCC Test	Y	4/12/1988	2004	11	Mineral oil		Cement Dike	2
4470	Storage Tank	470	SUCS1		Y	Y	Y	SPCC Test	Y	10/8/1988	2004	11	Mineral oil		Cement Dike	2
4471	Storage Tank	471	SUCS1		Y	Y	Y	SPCC Test	Y	4/12/1988	2004	11	Mineral oil		Cement Dike	2
4472	Storage Tank	472	SUCS1		Y	Y	Y	SPCC Test	Y	10/8/1988	2004	11	Mineral oil		Cement Dike	2
4473	Storage Tank	473	SUCS1		Y	Y	Y	SPCC Test	Y	4/12/1988	2004	11	Mineral oil		Cement Dike	2
4474	Storage Tank	474	SUCS1		Y	Y	Y	SPCC Test	Y	10/8/1988	2004	11	Mineral oil		Cement Dike	2
4475	Storage Tank	475	SUCS1		Y	Y	Y	SPCC Test	Y	4/12/1988	2004	11	Mineral oil		Cement Dike	2
4476	Storage Tank	476	SUCS1		Y	Y	Y	SPCC Test	Y	10/8/1988	2004	11	Mineral oil		Cement Dike	2
4477	Storage Tank	477	SUCS1		Y	Y	Y	SPCC Test	Y	4/12/1988	2004	11	Mineral oil		Cement Dike	2
4478	Storage Tank	478	SUCS1		Y	Y	Y	SPCC Test	Y	10/8/1988	2004	11	Mineral oil		Cement Dike	2
4479	Storage Tank	479	SUCS1		Y	Y	Y	SPCC Test	Y	4/12/1988	2004	11	Mineral oil		Cement Dike	2
4480	Storage Tank	480	SUCS1		Y	Y	Y	SPCC Test	Y	10/8/1988	2004	11	Mineral oil		Cement Dike	2
4481	Storage Tank	481	SUCS1		Y	Y	Y	SPCC Test	Y	4/12/1988	2004	11	Mineral oil		Cement Dike	2
4482	Storage Tank	482	SUCS1		Y	Y	Y	SPCC Test	Y	10/8/1988	2004	11	Mineral oil		Cement Dike	2
4483	Storage Tank	483	SUCS1		Y	Y	Y	SPCC Test	Y	4/12/1988	2004	11	Mineral oil		Cement Dike	2
4484	Storage Tank	484	SUCS1		Y	Y	Y	SPCC Test	Y	10/8/1988	2004	11	Mineral oil		Cement Dike	2
4485	Storage Tank	485	SUCS1		Y	Y	Y	SPCC Test	Y	4/12/1988	2004	11	Mineral oil		Cement Dike	2
4486	Storage Tank	486	SUCS1		Y	Y	Y	SPCC Test	Y	10/8/1988	2004	11	Mineral oil		Cement Dike	2
4487	Storage Tank	487	SUCS1		Y	Y	Y	SPCC Test	Y	4/12/1988	2004	11	Mineral oil		Cement Dike	2
4488	Storage Tank	488	SUCS1		Y	Y	Y	SPCC Test	Y	10/8/1988	2004	11	Mineral oil		Cement Dike	2
4489	Storage Tank	489	SUCS1		Y	Y	Y	SPCC Test	Y	4/12/1988	2004	11	Mineral oil		Cement Dike	2
4490	Storage Tank	490	SUCS1		Y	Y	Y	SPCC Test	Y	10/8/1988	2004	11	Mineral oil		Cement Dike	2
4491	Storage Tank	491	SUCS1		Y	Y	Y	SPCC Test	Y	4/12/1988	2004	11	Mineral oil		Cement Dike	2
4492	Storage Tank	492	SUCS1		Y	Y	Y	SPCC Test	Y	10/8/1988	2004	11	Mineral oil		Cement Dike	2
4493	Storage Tank	493	SUCS1		Y	Y	Y	SPCC Test	Y	4/12/1988	2004	11	Mineral oil		Cement Dike	2
4494	Storage Tank	494	SUCS1		Y	Y	Y	SPCC Test	Y	10/8/1988	2004	11	Mineral oil		Cement Dike	2
4495	Storage Tank	495	SUCS1		Y	Y	Y	SPCC Test	Y	4/12/1988	2004	11	Mineral oil		Cement Dike	2
4496	Storage Tank	496	SUCS1		Y	Y	Y	SPCC Test	Y	10/8/1988	2004	11	Mineral oil		Cement Dike	2
4497	Storage Tank	497	SUCS1		Y	Y	Y	SPCC Test	Y	4/12/1988	2004	11	Mineral oil		Cement Dike	2
4498	Storage Tank	498	SUCS1		Y	Y	Y	SPCC Test	Y	10/8/1988	2004	11	Mineral oil		Cement Dike	2
4499	Storage Tank	499	SUCS1		Y	Y	Y	SPCC Test	Y	4/12/1988	2004	11	Mineral oil		Cement Dike	2
4500	Storage Tank	500	SUCS1		Y	Y	Y	SPCC Test	Y	10/8/1988	2004	11	Mineral oil		Cement Dike	2
4501	Storage Tank	501	SUCS1		Y	Y	Y	SPCC Test	Y	4/12/1988	2004	11	Mineral oil		Cement Dike	2
4502	Storage Tank	502	SUCS1		Y	Y	Y	SPCC Test	Y	10/8/1988	2004	11	Mineral oil		Cement Dike	2
4503	Storage Tank	503	SUCS1		Y	Y	Y	SPCC Test	Y	4/12/1988	2004	11	Mineral oil		Cement Dike	2
4504	Storage Tank	504	SUCS1		Y	Y	Y	SPCC Test	Y	10/8/1988	2004	11	Mineral oil		Cement Dike	2
4505	Storage Tank	505	SUCS1		Y	Y	Y	SPCC Test	Y	4/12/1988	2004	11	Mineral oil		Cement Dike	2
4506	Storage Tank	506	SUCS1		Y	Y	Y	SPCC Test	Y	10/8/1988	2004	11	Mineral oil		Cement Dike	2
4507	Storage Tank	507	SUCS1		Y	Y	Y	SPCC Test	Y	4/12/1988	2004	11	Mineral oil		Cement Dike	2
4508	Storage Tank	508	SUCS1		Y	Y	Y	SPCC Test	Y	10/8/1988	2004	11	Mineral oil		Cement Dike	2
4509	Storage Tank	509	SUCS1		Y	Y	Y	SPCC Test	Y	4/12/1988	2004	11	Mineral oil		Cement Dike	2
4510	Storage Tank	510	SUCS1		Y	Y	Y	SPCC Test	Y	10/8/1988	2004	11	Mineral oil		Cement Dike	2
4511	Storage Tank	511	SUCS1		Y	Y	Y	SPCC Test	Y	4/12/1988	2004	11	Mineral oil		Cement Dike	2
4512	Storage Tank	512	SUCS1		Y	Y	Y	SPCC Test	Y	10/8/1988	2004	11	Mineral oil		Cement Dike	2
4513	Storage Tank	513	SUCS1		Y	Y	Y	SPCC Test	Y	4/12/1988	2004	11	Mineral oil		Cement Dike	2
4514	Storage Tank	514	SUCS1		Y	Y	Y	SPCC Test	Y	10/8/1988	2004	11	Mineral oil		Cement Dike	2
4515	Storage Tank	515	SUCS1		Y	Y	Y	SPCC Test	Y	4/12/1988	2004	11	Mineral oil		Cement Dike	2
4516	Storage Tank	516	SUCS1		Y	Y	Y	SPCC Test	Y	10/8/1988	2004	11	Mineral oil		Cement Dike	2
4517	Storage Tank	517	SUCS1		Y	Y	Y	SPCC Test	Y	4/12/1988	2004	11	Mineral oil		Cement Dike	2
4518	Storage Tank	518	SUCS1		Y	Y	Y	SPCC Test	Y	10/8/1988	2004	11	Mineral oil		Cement Dike	2
4519	Storage Tank	519	SUCS1		Y	Y	Y	SPCC Test	Y	4/12/1988	2004	11	Mineral oil		Cement Dike	2
4520	Storage Tank	520	SUCS1		Y	Y	Y	SPCC Test	Y	10/8/1988	2004	11	Mineral oil		Cement Dike	2
4521	Storage Tank	521	SUCS1		Y	Y	Y	SPCC Test	Y	4/12/1988	2004	11	Mineral oil		Cement Dike	2
4522	Storage Tank	522	SUCS1		Y	Y	Y	SPCC Test	Y	10/8/1988	2004	11	Mineral oil		Cement Dike	2
4523	Storage Tank	523	SUCS1		Y	Y	Y	SPCC Test	Y	4/12/1988	2004	11	Mineral oil		Cement Dike	2
4524	Storage Tank	524	SUCS1		Y	Y	Y	SPCC Test	Y	10/8/1988	2004	11	Mineral oil		Cement Dike	2
4525	Storage Tank	525	SUCS1		Y	Y	Y	SPCC Test	Y	4/12/1988	2004	11	Mineral oil		Cement Dike	2
4526	Storage Tank	526	SUCS1		Y	Y	Y	SPCC Test	Y	10/8/1988	2004	11	Mineral oil		Cement Dike	2
4527	Storage Tank	527	SUCS1		Y	Y	Y	SPCC Test	Y	4/12/1988	2004	11	Mineral oil		Cement Dike	2
4528	Storage Tank	528	SUCS1		Y	Y	Y	SPCC Test	Y	10/8/1988	2004	11	Mineral oil		Cement Dike	2
4529	Storage Tank	529	SUCS1		Y	Y	Y	SPCC Test	Y	4/12/1988	2004	11	Mineral oil		Cement Dike	2
4530	Storage Tank	530	SUCS1		Y	Y	Y	SPCC Test	Y	10/8/1988	2004	11	Mineral oil		Cement Dike	2
4531	Storage Tank	531	SUCS1		Y	Y	Y	SPCC Test	Y	4/12/1988	2004	11	Mineral oil		Cement Dike	2
4532	Storage Tank	532	SUCS1		Y	Y	Y	SPCC Test	Y	10/8/1988	2004	11	Mineral oil		Cement Dike	2
4533	Storage Tank	533	SUCS1		Y	Y	Y	SPCC Test	Y	4/12/1988	2004	11	Mineral oil		Cement Dike	2
4534	Storage Tank	534	SUCS1		Y	Y	Y	SPCC Test	Y	10/8/1988	2004	11	Mineral oil		Cement Dike	2
4535	Storage Tank	535	SUCS1		Y	Y	Y	SPCC Test	Y	4/12/1988	2004	11	Mineral oil		Cement Dike	2
4536	Storage Tank	536	SUCS1		Y	Y	Y	SPCC Test	Y	10/8/1988	2004	11	Mineral oil		Cement Dike	2
4537	Storage Tank	537	SUCS1		Y	Y	Y	SPCC Test	Y	4/12/1988	2004					

Tank	Capacity (GAL)	Purpose	Description	Material Backup function	Steamventilation?	UNSL SAT SPEC met	AST Fluid	Insulation	Last Inspection	Next Inspection	Year	Month	Generic Chemical Name	#N/A	Secondary Containment Backup function	Height (ft)
D011'	1000	Storage Tank							9/13/97							
D012'	1000	Storage Tank							9/13/97							
D013'	1000	Storage Tank							9/13/97							
D014'	1000	Storage Tank							9/13/97							
D015'	1000	Storage Tank							9/13/97							
D016'	1000	Storage Tank							9/13/97							
D017'	1000	Storage Tank							9/13/97							
D018'	1000	Storage Tank							9/13/97							
D019'	1000	Storage Tank							9/13/97							
D020'	1000	Storage Tank							9/13/97							
D021'	1000	Storage Tank							9/13/97							
D022'	1000	Storage Tank							9/13/97							
D023'	1000	Storage Tank							9/13/97							
D024'	1000	Storage Tank							9/13/97							
D025'	1000	Storage Tank							9/13/97							
D026'	1000	Storage Tank							9/13/97							
D027'	1000	Storage Tank							9/13/97							
D028'	1000	Storage Tank							9/13/97							
D029'	1000	Storage Tank							9/13/97							
D030'	1000	Storage Tank							9/13/97							
D031'	1000	Storage Tank							9/13/97							
D032'	1000	Storage Tank							9/13/97							
D033'	1000	Storage Tank							9/13/97							
D034'	1000	Storage Tank							9/13/97							
D035'	1000	Storage Tank							9/13/97							
D036'	1000	Storage Tank							9/13/97							
D037'	1000	Storage Tank							9/13/97							
D038'	1000	Storage Tank							9/13/97							
D039'	1000	Storage Tank							9/13/97							
D040'	1000	Storage Tank							9/13/97							
D041'	1000	Storage Tank							9/13/97							
D042'	1000	Storage Tank							9/13/97							
D043'	1000	Storage Tank							9/13/97							
D044'	1000	Storage Tank							9/13/97							
D045'	1000	Storage Tank							9/13/97							
D046'	1000	Storage Tank							9/13/97							
D047'	1000	Storage Tank							9/13/97							
D048'	1000	Storage Tank							9/13/97							
D049'	1000	Storage Tank							9/13/97							
D050'	1000	Storage Tank							9/13/97							
D051'	1000	Storage Tank							9/13/97							
D052'	1000	Storage Tank							9/13/97							
D053'	1000	Storage Tank					</									

SPCC Tanks

Tank	Capacity [GAL]	Purpose	Description	Material look-up function	shearpenetration? →	HAZID, S&V SPCC incl	AST Field	Installation Year	Last Inspection	Next Inspection	Year	Month	Generic Chemical Name #N/A	Secondary Containment ←look-up function	Height (ft)
E045E ¹	?	Weight/Charge tk		variable organici	Y	SPCC incl		#N/A					variable organici		
E045F ¹	?	Weight/Charge tk		variable organici	Y	SPCC incl		#N/A					variable organici		
E046 ¹	1264	Weight/Charge tk	hold/charge tank E46A	79200i	Y	SPCC incl					2004	1	Mixture	none	0
E046B ¹		Weight/Charge tk		variable organici	Y	SPCC incl							variable organici		
E046C ¹		Weight/Charge tk		variable organici	Y	SPCC incl							variable organici		
E046D ¹		Weight/Charge tk		variable organici	Y	SPCC incl							variable organici		
E046E ¹		Weight/Charge tk		variable organici	Y	SPCC incl							variable organici		
E046F ¹		Weight/Charge tk		variable organici	Y	SPCC incl							variable organici		
E047 ¹	1272	feed tank	hold/charge tank E47A	76380i	Y	SPCC incl		10/24/1980			2004	2	Mixture	none	0
E047A ¹		Weight/Charge tk		variable organici	Y	SPCC incl							variable organici		
E047B ¹		Weight/Charge tk		variable organici	Y	SPCC incl							variable organici		
E047C ¹		Weight/Charge tk		variable organici	Y	SPCC incl							variable organici		
E047D ¹		Weight/Charge tk		variable organici	Y	SPCC incl							variable organici		
E047E ¹		Weight/Charge tk		variable organici	Y	SPCC incl							variable organici		
E047F ¹		Weight/Charge tk		variable organici	Y	SPCC incl							variable organici		
E050 ¹	24437	blend tank		variable organici	Y	SPCC incl		8/27/1990	11/13/01		2004	2	variable organici	none	0
E051 ¹	3000	feed tank	hold/charge tank E51	variable organici	Y	SPCC incl		9/8/1990			2004	2	variable organici	none	0
E052 ¹	3000	feed tank	hold/charge tank E52	variable organici	Y	SPCC incl		9/8/1990			2004	2	variable organici	none	0
E055 ¹	8555	feed tank	hold/charge tank E55	variable organici	Y	SPCC incl		7/11/1942	6/1/30		2003	12	variable organici	none	0
E056 ¹	12158	feed tank	hold/charge tank E56	variable organici	Y	SPCC incl		7/11/1955	5/1/30		2004	2	variable organici	none	0
E057 ¹	12158	feed tank	hold/charge tank E57	variable organici	Y	SPCC incl		7/11/1955	5/1/30		2004	2	variable organici	none	0
E060 ¹	3006	feed tank	hold/charge tank E60	variable organici	Y	SPCC incl		10/22/1980			2004	2	variable organici	none	0
E061 ¹	1815	feed tank	hold/charge tank E61	variable organici	Y	SPCC incl		10/31/1990			2004	2	variable organici	none	0
E063 ¹	1815	feed tank	hold/charge tank E62	variable organici	Y	SPCC incl		10/31/1990			2004	2	variable organici	none	0
E063 ¹	1815	feed tank	hold/charge tank E63	Flush oil	Y	SPCC incl		10/31/1990			2006	4	Mixture	none	0
E063 ¹	1815	feed tank	hold/charge tank E64	variable organici	Y	SPCC incl		10/31/1990			2004	2	variable organici	none	0
E063 ¹	1815	feed tank	hold/charge tank E65	variable organici	Y	SPCC incl		10/31/1990			2004	2	variable organici	none	0
E063 ¹	1815	feed tank	hold/charge tank E66	variable organici	Y	SPCC incl		10/31/1990			2004	2	variable organici	none	0
E063 ¹	1815	feed tank	hold/charge tank E67	variable organici	Y	SPCC incl		10/31/1990			2004	2	variable organici	none	0
E068 ¹	1802	feed tank	hold/charge tank E68	variable organici	Y	SPCC incl		10/31/1990			2004	2	variable organici	none	0
E069 ¹	1814	feed tank	hold/charge tank E69	variable organici	Y	SPCC incl		10/31/1990			2004	2	variable organici	none	0
E070 ¹	3163	feed tank	hold/charge tank E70	variable organici	Y	SPCC incl		10/22/1990			2004	11	variable organici	none	0
E072 ¹	550														
E073 ¹	550							21/6/1984							

Spill Tanks

Tank	Capacity (GAL)	Purpose	Description	Material lookup function	sheen/emulsion?	RURAL S/N	AST Field	Installation Year	Last Inspection	Next Inspection	Year	Month	Generic Chemical Name	#N/A	Secondary Containment	Height (ft)
J071	275	process tank				SPCC mat		#N/A							lockup function	
J072	7810	process tank	process tank J72	177.851	Y	SPCC mat		1/31/1992			2005	3	Polychlorinated phenol			
J073	1000	process tank				SPCC mat		2/11/2000								
J074	1000	process tank				SPCC mat		2/11/2000								
J075	4068	reactor	reactor J76		N	SPCC mat		10/31/1979			2002	3	variable organic			
J076	500	Weight-Charge tank				SPCC mat		2/3/1988								
J077	1040.3	Weight-Charge tank			Y	SPCC mat		3/6/1982					variable organic			
J078	834	existing			N	SPCC mat		3/6/1982					variable organic			
J079	1000	process tank				SPCC mat		2/11/2000								
J080	1000	process tank				SPCC mat		2/11/2000								
J081	1000	process tank				SPCC mat		2/11/2000								
J082	5251	Weight-Charge tank			Y	SPCC mat		10/12/1983					variable organic			
J083	5251	feed tank	hold-charge tank J83		Y	SPCC mat		10/12/1983	7/1/07	7/1/07	2004	2	variable organic			
J084	1000	process tank				SPCC mat		2/11/2000								
J085	1000	process tank				SPCC mat		2/11/2000								
J086	1000	process tank				SPCC mat		2/11/2000								
J087	1000	process tank				SPCC mat		2/11/2000								
J088	1000	process tank				SPCC mat		2/11/2000								
J089	1000	process tank				SPCC mat		2/11/2000								
J090	1000	process tank				SPCC mat		2/11/2000								
J091	1000	process tank				SPCC mat		2/11/2000								
J092	1000	process tank				SPCC mat		2/11/2000								
J093	1000	process tank				SPCC mat		2/11/2000								
J094	1000	process tank				SPCC mat		2/11/2000								
J095	1000	process tank				SPCC mat		2/11/2000								
J096	1000	process tank				SPCC mat		2/11/2000								
J097	1000	process tank				SPCC mat		2/11/2000								
J098	1000	process tank				SPCC mat		2/11/2000								
J099	1000	process tank				SPCC mat		2/11/2000								
J100	1000	process tank				SPCC mat		2/11/2000								
J101	1000	process tank				SPCC mat		2/11/2000								
J102	1000	process tank				SPCC mat		2/11/2000								
J103	1000	process tank				SPCC mat		2/11/2000								
J104	1000	process tank				SPCC mat		2/11/2000								
J105	1000	process tank				SPCC mat		2/11/2000								
J106	1000	process tank				SPCC mat		2/11/2000								
J107	1000	process tank				SPCC mat		2/11/2000								
J108	1000	process tank				SPCC mat		2/11/2000								
J109	1000	process tank				SPCC mat		2/11/2000								
J110	1000	process tank				SPCC mat		2/11/2000								
J111	1000	process tank				SPCC mat		2/11/2000								
J112	1000	process tank				SPCC mat		2/11/2000								
J113	1000	process tank				SPCC mat		2/11/2000								
J114	1000	process tank				SPCC mat		2/11/2000								
J115	1000	process tank				SPCC mat		2/11/2000								
J116	1000	process tank				SPCC mat		2/11/2000								
J117	1000	process tank				SPCC mat		2/11/2000								
J118	1000	process tank				SPCC mat		2/11/2000								
J119	1000	process tank				SPCC mat		2/11/2000								
J120	1000	process tank				SPCC mat		2/11/2000								
J121	1000	process tank				SPCC mat		2/11/2000								
J122	1000	process tank				SPCC mat		2/11/2000								
J123	1000	process tank				SPCC mat		2/11/2000								
J124	1000	process tank				SPCC mat		2/11/2000								
J125	1000	process tank				SPCC mat		2/11/2000								
J126	1000	process tank				SPCC mat		2/11/2000								
J127	1000	process tank				SPCC mat		2/11/2000								
J128	1000	process tank				SPCC mat		2/11/2000								
J129	1000	process tank				SPCC mat		2/11/2000								
J130	1000	process tank				SPCC mat		2/11/2000								
J131	1000	process tank				SPCC mat		2/11/2000								
J132	1000	process tank				SPCC mat		2/11/2000								
J133	1000	process tank				SPCC mat		2/11/2000								
J134	1000	process tank				SPCC mat		2/11/2000								
J135	1000	process tank				SPCC mat		2/11/2000								
J136	1000	process tank				SPCC mat		2/11/2000								
J137	1000	process tank				SPCC mat		2/11/2000								
J138	1000	process tank				SPCC mat		2/11/2000								
J139	1000	process tank				SPCC mat		2/11/2000								
J140	1000	process tank				SPCC mat		2/11/2000								
J141	1000	process tank				SPCC mat		2/11/2000								
J142	1000	process tank				SPCC mat		2/11/2000								
J143	1000	process tank				SPCC mat		2/11/2000								
J144	1000	process tank				SPCC mat		2/11/2000								
J145	1000	process tank				SPCC mat		2/11/2000								
J146	1000	process tank				SPCC mat		2/11/2000								
J147	1000	process tank				SPCC mat		2/11/2000								
J148	1000	process tank				SPCC mat		2/11/2000								
J149	1000	process tank				SPCC mat		2/11/2000								
J150	1000	process tank				SPCC mat		2/11/2000								
J151	1000	process tank				SPCC mat		2/11/2000								
J152	1000	process tank				SPCC mat		2/11/2000								
J153	1000	process tank				SPCC mat		2/11/2000								
J154	1000	process tank				SPCC mat		2/11/2000								
J155	1000	process tank				SPCC mat		2/11/2000								
J156	1000	process tank				SPCC mat		2/11/2000								
J157	1000	process tank				SPCC mat		2/11/2000								
J158	1000	process tank				SPCC mat		2/11/2000								
J159	1000	process tank				SPCC mat		2/11/2000								
J160	1000	process tank				SPCC mat		2/11/2000								
J161	1000	process tank				SPCC mat		2/11/2000								
J162	1000	process tank				SPCC mat		2/11/2000								
J163	1000	process tank				SPCC mat		2/11/2000								
J164	1000	process tank				SPCC mat		2/11/2000								
J165	1000	process tank				SPCC mat		2/11/2000								
J166	1000	process tank				SPCC mat		2/11/2000								
J167	1000	process tank				SPCC mat		2/11/2000								
J168	1000	process tank				SPCC mat		2/11/2000								
J169	1000	process tank				SPCC mat		2/11/2000								
J170	1000	process tank				SPCC mat		2/11/2000								
J171	1000	process tank				SPCC mat		2/11/2000								
J172	1000	process tank				SPCC mat		2/11/2000								
J173	1000	process tank				SPCC mat		2/11/2000								
J174	1000	process tank				SPCC mat		2/11/2000								
J175	1000	process tank				SPCC mat		2/11/2000								
J176	1000	process tank				SPCC mat		2/11/2000								
J177	1000	process tank				SPCC mat		2/11/2000								
J178	1000	process tank				SPCC mat		2/11/2000								
J179	1000	process tank				SPCC mat		2/11/2000								
J180	1000	process tank				SPCC mat		2/11/2000								
J181	1000	process tank				SPCC mat		2/11/2000								
J182	1000	process tank				SPCC mat		2/11/2000								
J183	1000	process tank				SPCC mat		2/11/2000								
J184	1000	process tank				SPCC mat		2/11/2000								
J185	1000	process tank				SPCC mat		2/11/2000								
J186	1000	process tank				SPCC mat		2/11/2000								
J187	1000	process tank				SPCC mat		2/11/2000								
J188	1000	process tank				SPCC mat		2/11/2000								
J189	1000	process tank				SPCC mat		2/11/2000								
J190	1000	process tank				SPCC mat		2/11/2000								
J191	1000	process tank				SPCC mat		2/11/2000								
J192	1000	process tank				SPCC mat		2/11/2000								
J193	1000	process tank				SPCC mat		2/11/2000								
J194	1000	process tank				SPCC mat		2/11/2000								
J195																

SPOC_Tanks

Tank	Capacity [GAL]	Purpose	Description	Material	Material look-up function	sheen/emulsion?	SPCC mat?	AST Field	Installation Year	Last Inspection	Next Inspection	Year Month	Generic Chemical Name	#N/A	Secondary Containment look-up function	Height (ft)
S014'	2400	Wastewater	Wastewater treated	Wastewater	Wastewater	Y	SPCC mat		N/A				Mixture		pit	
S015'		Wastewater treated	Wastewater treated	Wastewater	Wastewater	N	SPCC mat		N/A				Mixture		pit	
S016'		Wastewater treated	Wastewater treated	Wastewater	Wastewater	N	SPCC mat		N/A				Mixture		pit	
S017'		Wastewater treated	Wastewater treated	Wastewater	Wastewater	N	SPCC mat		N/A				Mixture		pit	
S018'	5300	NaOCl	NaOCl	NaOCl	NaOCl	N	SPCC mat		9/22/2004				Sodium hypochlorite		concrete	
S020'	6200	Polymer	Polymer	Polymer	Polymer	N	SPCC mat		10/21/2004				Polymer		plastic surround tub	
SE14'									10/1/1997							
SE15'									N/A				Calcium hydroxide		none	
T002'	51850	blend tank	hold charge tank T02	POU-1	POU-1	Y	SPCC mat	Y	8/20/1976	4/28/99		2004	2	1-decane homopolymers hydrogenated	none	0
T003'									8/20/1976							
T004'	2320								8/20/1976							
T005'	2320								8/20/1976							
T006'	2320								8/20/1976							
T007'	2320								8/20/1976							
T008'	2320								8/20/1976							
T009'	2320								8/20/1976							
T010'	2320								8/20/1976							
T011'	2320								8/20/1976							
T012'	2320								8/20/1976							
T013'	2320								8/20/1976							
T014'	2320								8/20/1976							
T015'	2320								8/20/1976							
T016'	2320								8/20/1976							
T017'	2320								8/20/1976							
T018'	2320								8/20/1976							
T019'	2320								8/20/1976							
T020'	2320								8/20/1976							
T021'	2320								8/20/1976							
T022'	2320								8/20/1976							
T023'	2320								8/20/1976							
T024'	2320								8/20/1976							
T025'	2320								8/20/1976							
T026'	2320								8/20/1976							
T027'	2320								8/20/1976							
T028'	2320								8/20/1976							
T029'	2320								8/20/1976							
T030'	2320								8/20/1976							
T031'	2320								8/20/1976							
T032'	2320								8/20/1976							
T033'	2320								8/20/1976							
T034'	2320								8/20/1976							
T035'	2320								8/20/1976							
T036'	2320								8/20/1976							
T037'	2320								8/20/1976							
T038'	2320								8/20/1976							
T039'	2320								8/20/1976							
T040'	2320								8/20/1976							
T041'	2320								8/20/1976							
T042'	2320								8/20/1976							
T043'	2320								8/20/1976							
T044'	2320								8/20/1976							
T045'	2320								8/20/1976							
T046'	2320								8/20/1976							
T047'	2320								8/20/1976							
T048'	2320								8/20/1976							
T049'	2320								8/20/1976							
T050'	2320								8/20/1976							
T051'	2320								8/20/1976							
T052'	2320								8/20/1976							
T053'	2320								8/20/1976							
T054'	2320								8/20/1976							
T055'	2320								8/20/1976							
T056'	2320								8/20/1976							
T057'	2320								8/20/1976							
T058'	2320								8/20/1976							
T059'	2320								8/20/1976							
T060'	2320								8/20/1976							
T061'	2320								8/20/1976							
T062'	2320								8/20/1976							
T063'	2320								8/20/1976							
T064'	2320								8/20/1976							
T065'	2320								8/20/1976							
T066'	2320								8/20/1976							
T067'	2320								8/20/1976							
T068'	2320								8/20/1976							
T069'	2320								8/20/1976							
T070'	2320								8/20/1976							
T071'	2320								8/20/1976							
T072'	2320								8/20/1976							
T073'	2320								8/20/1976							
T074'	2320								8/20/1976							
T075'	2320								8/20/1976							
T076'	2320								8/20/1976							
T077'	2320								8/20/1976							
T078'	2320								8/20/1976							
T079'	2320								8/20/1976							
T080'	2320								8/20/1976							
T081'	2320								8/20/1976							
T082'	2320								8/20/1976							
T083'	2320								8/20/1976							
T084'	2320								8/20/1976							
T085'	2320								8/20/1976							
T086'	2320								8/20/1976							
T087'	2320								8/20/1976							
T088'	2320								8/20/1976							
T089'	2320								8/20/1976							
T090'	2320								8/20/1976							
T091'	2320								8/20/1976							
T092'	2320								8/20/1976							
T093'	2320								8/20/1976							
T094'	2320								8/20/1976							
T095'	2320								8/20/1976							
T096'	2320								8/20/1976							
T097'	2320								8/20/1976							
T098'	2320								8/20/1976							
T099'	2320								8/20/1976							
T100'	2320								8/20/1976							
T101'	2320								8/20/1976							
T102'	2320								8/20/1976							
T103'	2320								8/20/1976							
T104'	2320								8/20/1976							
T105'	2320								8/20/1976							
T106'	2320								8/20/1976							
T107'	2320								8/20/1976							
T108'	2320								8/20/1976							
T109'	2320								8/20/1976							
T110'	2320								8/20/1976							
T111'	2320								8/20/1976							
T112'	2320								8/20/1976							
T113'	2320								8/20/1976							
T114'	2320								8/20/1976							
T115'	2320								8/20/1976							
T116'	2320								8/20/1976							
T117'	2320								8/20/1976							
T118'	2320								8/20/1976							
T119'	2320								8/20/1976							
T120'	2320								8/20/1976							
T121'	2320								8/20/1976							
T122'	2320								8/20/1976							
T123'</																